



DEFENDANT: Sylviane Della Whitmore  
CASE NUMBER: 2:17-cr-00110-APG-DJA-3

**ADDITIONAL COUNTS OF CONVICTION**

<b><u>Title &amp; Section</u></b>	<b><u>Nature of Offense</u></b>	<b><u>Offense Ended</u></b>	<b><u>Count</u></b>
18:1957 and 2	Money Laundering; Aiding and Abetting	1/21/2012	Count 6
18:1957 and 2	Money Laundering; Aiding and Abetting	10/7/2013	Count 7
18:2314	Interstate Transportation of Stolen Property	5/26/2015	Count 12
18:1957 and 2	Money Laundering; Aiding and Abetting	8/4/2014	Count 28
18:1957 and 2	Money Laundering; Aiding and Abetting	4/11/2015	Count 29
18:1957 and 2	Money Laundering; Aiding and Abetting	5/27/2015	Count 30
18:1957 and 2	Money Laundering; Aiding and Abetting	5/28/2015	Count 31
18:1957 and 2	Money Laundering; Aiding and Abetting	6/1/2015	Count 32

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## IMPRISONMENT

The defendant is hereby committed to the custody of the Federal Bureau of Prisons to be imprisoned for a total term of :  
24 months, per count, concurrent.

- ☒ The court makes the following recommendations to the Bureau of Prisons:  
FCI Dublin, based on proximity to family and support system, length of sentence and proximity to outside health care if needed.
- ☐ The defendant is remanded to the custody of the United States Marshal.
- ☐ The defendant shall surrender to the United States Marshal for this district:  
☐ at \_\_\_\_\_ ☐ a.m. ☐ p.m. on \_\_\_\_\_ .  
☐ as notified by the United States Marshal.
- ☒ The defendant shall surrender for service of sentence at the institution designated by the Bureau of Prisons:  
☒ before 12 p.m. on 6/28/2024 - The surrender date was extended to September 27, 2024, per ECF No. 538.  
☐ as notified by the United States Marshal.  
☐ as notified by the Probation or Pretrial Services Office.

## RETURN

I have executed this judgment as follows:

Defendant delivered on \_\_\_\_\_ to \_\_\_\_\_  
at \_\_\_\_\_ with a certified copy of this judgment.

UNITED STATES MARSHAL

By \_\_\_\_\_  
DEPUTY UNITED STATES MARSHAL

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### SUPERVISED RELEASE

Upon release from imprisonment, you will be on supervised release for a term of :

3 years, per count, concurrent.

### MANDATORY CONDITIONS

1. You must not commit another federal, state or local crime.
2. You must not unlawfully possess a controlled substance.
3. You must refrain from any unlawful use of a controlled substance. You must submit to one drug test within 15 days of release from imprisonment and at least two periodic drug tests thereafter, as determined by the court, not to exceed 104 tests annually..  
☐ The above drug testing condition is suspended, based on the court's determination that you pose a low risk of future substance abuse. *(check if applicable)*
4. ☒ You must make restitution in accordance with 18 U.S.C. § 3663 and 3663A or any other statute authorizing a sentence of restitution. *(check if applicable)*
5. ☒ You must cooperate in the collection of DNA as directed by the probation officer. *(check if applicable)*
6. ☐ You must comply with the requirements of the Sex Offender Registration and Notification Act (34 U.S.C. § 20901, *et seq.*) as directed by the probation officer, the Bureau of Prisons, or any state sex offender registration agency in the location where you reside, work, are a student, or were convicted of a qualifying offense. *(check if applicable)*
7. ☐ You must participate in an approved program for domestic violence. *(check if applicable)*

You must comply with the standard conditions that have been adopted by this court as well as with any other conditions on the attached page.

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## STANDARD CONDITIONS OF SUPERVISION

As part of your supervised release, you must comply with the following standard conditions of supervision. These conditions are imposed because they establish the basic expectations for your behavior while on supervision and identify the minimum tools needed by probation officers to keep informed, report to the court about, and bring about improvements in your conduct and condition.

1. You must report to the probation office in the federal judicial district where you are authorized to reside within 72 hours of your release from imprisonment, unless the probation officer instructs you to report to a different probation office or within a different time frame.
2. After initially reporting to the probation office, you will receive instructions from the court or the probation officer about how and when you must report to the probation officer, and you must report to the probation officer as instructed.
3. You must not knowingly leave the federal judicial district where you are authorized to reside without first getting permission from the court or the probation officer.
4. You must answer truthfully the questions asked by your probation officer.
5. You must live at a place approved by the probation officer. If you plan to change where you live or anything about your living arrangements (such as the people you live with), you must notify the probation officer at least 10 days before the change. If notifying the probation officer in advance is not possible due to unanticipated circumstances, you must notify the probation officer within 72 hours of becoming aware of a change or expected change.
6. You must allow the probation officer to visit you at any time at your home or elsewhere, and you must permit the probation officer to take any items prohibited by the conditions of your supervision that he or she observes in plain view.
7. You must work full time (at least 30 hours per week) at a lawful type of employment, unless the probation officer excuses you from doing so. If you do not have full-time employment you must try to find full-time employment, unless the probation officer excuses you from doing so. If you plan to change where you work or anything about your work (such as your position or your job responsibilities), you must notify the probation officer at least 10 days before the change. If notifying the probation officer at least 10 days in advance is not possible due to unanticipated circumstances, you must notify the probation officer within 72 hours of becoming aware of a change or expected change.
8. You must not communicate or interact with someone you know is engaged in criminal activity. If you know someone has been convicted of a felony, you must not knowingly communicate or interact with that person without first getting the permission of the probation officer.
9. If you are arrested or questioned by a law enforcement officer, you must notify the probation officer within 72 hours.
10. You must not own, possess, or have access to a firearm, ammunition, destructive device, or dangerous weapon (i.e., anything that was designed, or was modified for, the specific purpose of causing bodily injury or death to another person such as nunchakus or tasers).
11. You must not act or make any agreement with a law enforcement agency to act as a confidential human source or informant without first getting the permission of the court.
12. If the probation officer determines that you pose a risk to another person (including an organization), the probation officer may require you to notify the person about the specific risks posed by your criminal record and you must comply with that instruction. The probation officer may contact the person and confirm that you have notified the person about the specific risks posed by your criminal record.
13. You must follow the instructions of the probation officer related to the conditions of supervision.

## U.S. Probation Office Use Only

A U.S. probation officer has instructed me on the conditions specified by the court and has provided me with a written copy of this judgment containing these conditions. For further information regarding these conditions, see *Overview of Probation and Supervised Release Conditions*, available at: [www.uscourts.gov](http://www.uscourts.gov).

Defendant's Signature \_\_\_\_\_

Date \_\_\_\_\_

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**SPECIAL CONDITIONS OF SUPERVISION**

1. **Mental Health Treatment** – You must participate in a mental health treatment program [outpatient] and follow the rules and regulations of that program. The probation officer, in consultation with the treatment provider, will supervise your participation in the program (provider, location, modality, duration, intensity, etc.).
2. **Access to Financial Information** – You must provide the probation officer access to any requested financial information and authorize the release of any financial information. The probation office will share financial information with the U.S. Attorney's Office.
3. **Debt Obligations** – You must not incur new credit charges, or open additional lines of credit without the approval of the probation officer.
4. **No Contact** – You must not communicate, or otherwise interact, with codefendant Hurbace, either directly or through someone else, without first obtaining the permission of the probation office.
5. **Search and Seizure** – You must submit your person, property, house, residence, vehicle, papers, computers (as defined in 18 U.S.C. § 1030(e)(1)), other electronic communications or data storage devices or media, or office, to a search conducted by a United States Probation Officer. Failure to submit to a search may be grounds for revocation of release. You must warn any other occupants that the premises may be subject to searches pursuant to this condition.

The probation officer may conduct a search under this condition only when reasonable suspicion exists that you have violated a condition of supervision and that the areas to be searched contain evidence of this violation. Any search must be conducted at a reasonable time and in a reasonable manner.

6. **Home Confinement with Location Monitoring** – You will be monitored by the form of location monitoring technology indicated below for the first 365 days of supervision. You must follow the rules and regulations of the location monitoring program. You must pay the costs of the program based on your ability to pay.

☒ Location monitoring technology at the discretion of the probation officer.

This form of location monitoring technology will be used to monitor the following restriction on your movement in the community:

☒ You are restricted to your residence at all times except for employment; education; religious services; medical, substance abuse, or mental health treatment; attorney visits; court appearances; court-ordered obligations; or other activities as pre-approved by the probation officer (Home Detention).

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**CRIMINAL MONETARY PENALTIES**

The defendant must pay the following total criminal monetary penalties under the schedule of payments on Sheet 6.

	<u>Assessment</u>	<u>Restitution</u>	<u>Fine</u>	<u>AVAA Assessment*</u>	<u>JVTA Assessment**</u>
<b>TOTALS</b>	\$ 1,000.00	\$ 1,479,000.58	\$ 0.00	\$ 0.00	\$ 0.00

☐ The determination of restitution is deferred until \_\_\_\_\_. An *Amended Judgment in a Criminal Case (AO 245C)* will be entered after such determination.

☒ The defendant shall make restitution (including community restitution) to the following payees in the amount listed below.

If the defendant makes a partial payment, each payee shall receive an approximately proportioned payment, unless specified otherwise in the priority order or percentage payment column below. However, pursuant to 18 U.S.C. § 3664(i), all nonfederal victims must be paid before the United States is paid.

<u>Name of Payee</u>	<u>Total Loss***</u>	<u>Restitution Ordered</u>	<u>Priority or Percentage</u>
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(see attached order regarding restitution)

<b>TOTALS</b>	\$ _____	0.00	\$ _____	0.00
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☐ Restitution amount ordered pursuant to plea agreement \$ \_\_\_\_\_

☐ The defendant must pay interest on restitution and a fine of more than \$2,500, unless the restitution or fine is paid in full before the fifteenth day after the date of the judgment, pursuant to 18 U.S.C. § 3612(f). All of the payment options on Sheet 6 may be subject to penalties for delinquency and default, pursuant to 18 U.S.C. § 3612(g).

☐ The court determined that the defendant does not have the ability to pay interest, and it is ordered that:

☐ the interest requirement is waived for ☐ fine ☐ restitution.

☐ the interest requirement for the ☐ fine ☐ restitution is modified as follows:

\* Amy, Vicky, and Andy Child Pornography Victim Assistance Act of 2018, Pub. L. No. 115-299.

\*\* Justice for Victims of Trafficking Act of 2015, Pub. L. No. 114-22.

\*\*\* Findings for the total amount of losses are required under Chapters 109A, 110, 110A, and 113A of Title 18 for offenses committed on or after September 13, 1994, but before April 23, 1996.

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### SCHEDULE OF PAYMENTS

Having assessed the defendant's ability to pay, payment of the total criminal monetary penalties shall be due as follows:

- A** ☒ Lump sum payment of \$ \$ 1,480,000.58 due immediately, balance due
- ☐ not later than \_\_\_\_\_, or  
☒ in accordance with ☐ C, ☐ D, ☐ E, or ☒ F below; or
- B** ☐ Payment to begin immediately (may be combined with ☐ C, ☐ D, or ☐ F below); or
- C** ☐ Payment in equal \_\_\_\_\_ (e.g., weekly, monthly, quarterly) installments of \$ \_\_\_\_\_ over a period of \_\_\_\_\_ (e.g., months or years), to commence \_\_\_\_\_ (e.g., 30 or 60 days) after the date of this judgment; or
- D** ☐ Payment in equal \_\_\_\_\_ (e.g., weekly, monthly, quarterly) installments of \$ \_\_\_\_\_ over a period of \_\_\_\_\_ (e.g., months or years), to commence \_\_\_\_\_ (e.g., 30 or 60 days) after release from imprisonment to a term of supervision; or
- E** ☐ Payment during the term of supervised release will commence within \_\_\_\_\_ (e.g., 30 or 60 days) after release from imprisonment. The court will set the payment plan based on an assessment of the defendant's ability to pay at that time; or
- F** ☒ Special instructions regarding the payment of criminal monetary penalties:
- It is further recommended that any unpaid balance shall be paid at a monthly rate of not less than 10% of any income earned during incarceration and/or gross income while on supervision, subject to adjustment by the Court based upon ability to pay.

Unless the court has expressly ordered otherwise, if this judgment imposes imprisonment, payment of criminal monetary penalties is due during the period of imprisonment. All criminal monetary penalties, except those payments made through the Federal Bureau of Prisons' Inmate Financial Responsibility Program, are made to the clerk of the court.

The defendant shall receive credit for all payments previously made toward any criminal monetary penalties imposed.

☒ Joint and Several

Case Number Defendant and Co-Defendant Names (including defendant number)	Total Amount	Joint and Several Amount	Corresponding Payee, if appropriate.
<b>2:17-cr-00110-APG-DJA- 1 Phillip Hurbace and 2:17-cr-00110-APG-DJA-3 Sylviane Whitmore</b>			
<b>are ordered to pay restitution, jointly and severally, in the amount of \$1,479,000.58.</b>			

- ☐ The defendant shall pay the cost of prosecution.
- ☐ The defendant shall pay the following court cost(s):
- ☒ The defendant shall forfeit the defendant's interest in the following property to the United States:  
(see attached final order of forfeiture)

Payments shall be applied in the following order: (1) assessment, (2) restitution principal, (3) restitution interest, (4) AVAA assessment, (5) fine principal, (6) fine interest, (7) community restitution, (8) JVT A assessment, (9) penalties, and (10) costs, including cost of prosecution and court costs.



**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SYLVIANE DELLA WHITMORE,  
a/k/a: "Sylviane Cordova,"

Defendant.

2:17-CR-110-APG-DJA

**Final Order of Forfeiture**

The United States District Court for the District of Nevada entered an Order Granting Motion to Amend Preliminary Order of Forfeiture under Fed. R. Crim. P. 32.2(b)(1), (b)(2), and (b)(5); 18 U.S.C. § 981(a)(1)(A) and (a)(1)(C) with 28 U.S.C. § 2461(c); 18 U.S.C. § 982(a)(1); and 21 U.S.C. § 853(p). The jury, and this Court, found Sylviane Della Whitmore, a/k/a: "Sylviane Cordova," guilty of Counts 1-2, 6-7, 12, and 28-32, forfeiting \$32,938.34 of 10270 Hammerschmidt Court, Las Vegas, Nevada 89135 (Hammerschmidt property) and imposing in personam criminal forfeiture money judgments set forth in Forfeiture Allegation Two of the Superseding Criminal Indictment. The United States has shown the requisite nexus to the offenses to which Sylviane Della Whitmore, a/k/a: "Sylviane Cordova," was found guilty. Superseding Criminal Indictment, ECF No. 8; Minutes of Jury Trial, ECF No. 205 -208, 228 -229; Verdict Form, ECF No. 227; Order, ECF No. 247 at 32; Order, ECF No. 297; Minutes of Forfeiture Hearing, ECF No. 319; Order Granting Motion to Amend Preliminary Order of Forfeiture, ECF No. 366.

This Court finds that on the government's motion, the Court may at any time enter an order of forfeiture or amend an existing order of forfeiture to include subsequently located property or substitute property under Fed. R. Crim. P. 32.2(e) and 32.2(b)(2)(C).

The following in personam criminal forfeiture money judgment amounts comply with *United States v. Lo*, 839 F.3d 777 (9th Cir. 2016); *Honeycutt v. United States*, 581 U.S. 443 (2017); *United States v. Thompson*, 990 F.3d 680 (9th Cir. 2021); and *United States v. Prasad*, 18 F.4th 313 (9th Cir. 2021):

Count 1 a criminal forfeiture money judgment of \$459,000;

Count 2 a criminal forfeiture money judgment of \$459,000;

Count 6 a criminal forfeiture money judgment of \$269,000;

Count 7 a criminal forfeiture money judgment of \$178,034.70;

Count 12 a criminal forfeiture money judgment of \$32,938;

Count 28 a criminal forfeiture money judgment of \$190,000;

Count 29 a criminal forfeiture money judgment of \$18,899.37;

Count 30 a criminal forfeiture money judgment of \$32,938.34;

Count 31 a criminal forfeiture money judgment of \$76,263.01; and

Count 32 a criminal forfeiture money judgment of \$76,263.01.

The total amount of the money judgment that can be collected will not exceed \$459,000.

#### **Notice and Service for Amended Preliminary Order of Forfeiture**

This Court finds the United States published the notice of forfeiture in accordance with the law via the official government internet forfeiture site, [www.forfeiture.gov](http://www.forfeiture.gov), consecutively from November 23, 2023, through December 22, 2023, notifying all potential third parties of their right to petition the Court. Notice of Filing Proof of Publication Exhibits, ECF No. 387-1, p. 5.

This Court finds the United States notified known third parties by personal service and by regular mail and certified mail return receipt requested of their right to petition the Court. Notice of Filing Service of Process – Personal Service, ECF No. 412; Notice of Filing Service of Process – Mailing (NOFSOP-Amended POOF), ECF No. 424.

On January 11, 2024, the United States Attorney's Office served Briana Johnson, Clark County Assessor, by regular and certified return receipt mail with copies of the Order

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1 Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of  
2 Filing Service of Process – Mailing, ECF No. 424-1, pg. 10, 15-22, 141-142.

3 On January 18, 2024, the Internal Revenue Service personally served Briana  
4 Johnson, Clark County Assessor, with copies of the Order Granting Motion to Amend  
5 Preliminary Order of Forfeiture and the Notice. Notice of Filing Service of Process –  
6 Personal Service, ECF No. 412-1, pg. 3, 32-39.

7 On January 11, 2024, the United States Attorney's Office served Lynn Marie Goya,  
8 Clark County Clerk and on behalf of Clark County Water Reclamation District; the  
9 Commission Division; the Clark County Board of Commissioners; the Southern Nevada  
10 Water Authority; and the Las Vegas Valley Water District, by regular and certified return  
11 receipt mail with copies of the Order Granting Motion to Amend Preliminary Order of  
12 Forfeiture and the Notice. Notice of Filing Service of Process – Mailing, ECF No. 424-1,  
13 pg. 9, 15-22, 137-138.

14 On January 18, 2024, the Internal Revenue Service personally served Lynn Marie  
15 Goya, Clark County Clerk and on behalf of Clark County Water Reclamation District; the  
16 Commission Division; the Clark County Board of Commissioners; the Southern Nevada  
17 Water Authority; and the Las Vegas Valley Water District, with copies of the Order  
18 Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of  
19 Filing Service of Process – Personal Service, ECF No. 412-1, pg. 4, 32-39.

20 On January 11, 2024, the United States Attorney's Office served Steven B. Wolfson,  
21 Clark County District Attorney, by regular and certified return receipt mail with copies of  
22 the Order Granting Motion to Amend Preliminary Order of Forfeiture and the Notice.  
23 Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 11, 15-22, 159-160.

24 On January 18, 2024, the Internal Revenue Service personally served Steven B.  
25 Wolfson, Clark County District Attorney, with copies of the Order Granting Motion to  
26 Amend Preliminary Order of Forfeiture and the Notice. Notice of Filing Service of Process  
27 – Personal Service, ECF No. 412-1, pg. 5, 32-39.

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1 On January 11, 2024, the United States Attorney's Office served Debbie Conway,  
2 Clark County Recorder, by regular and certified return receipt mail with copies of the Order  
3 Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of  
4 Filing Service of Process – Mailing, ECF No. 424-1, pg. 9, 15-22, 127-128.

5 On January 18, 2024, the Internal Revenue Service personally served Debbie  
6 Conway, Clark County Recorder, with copies of the Order Granting Motion to Amend  
7 Preliminary Order of Forfeiture and the Notice. Notice of Filing Service of Process –  
8 Personal Service, ECF No. 412-1, pg. 6, 32-39.

9 On January 11, 2024, the United States Attorney's Office served J. Ken Diaz, Clark  
10 County Treasurer, by regular and certified return receipt mail with copies of the Order  
11 Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of  
12 Filing Service of Process – Mailing, ECF No. 424-1, pg. 9, 15-22, 129-130.

13 On January 18, 2024, the Internal Revenue Service personally served J. Ken Diaz,  
14 Clark County Treasurer, with copies of the Order Granting Motion to Amend Preliminary  
15 Order of Forfeiture and the Notice. Notice of Filing Service of Process – Personal Service,  
16 ECF No. 412-1, pg. 7, 32-39.

17 On January 11, 2024, the United States Attorney's Office served James B. Gibson,  
18 Chair of Clark County Commission; Vice President of Southern Nevada Water Authority;  
19 and Vice President of Las Vegas Valley Water District, by regular and certified return  
20 receipt mail with copies of the Order Granting Motion to Amend Preliminary Order of  
21 Forfeiture and the Notice. Notice of Filing Service of Process – Mailing, ECF No. 424-1,  
22 pg. 9, 15-22, 135-136.

23 On January 18, 2024, the Internal Revenue Service personally served James B.  
24 Gibson, Chair of Clark County Commission; Vice President of Southern Nevada Water  
25 Authority; and Vice President of Las Vegas Valley Water District, with copies of the Order  
26 Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of  
27 Filing Service of Process – Personal Service, ECF No. 412-1, pg. 8, 32-39.

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1 On January 11, 2024, the United States Attorney's Office served Kevin Schiller,  
2 Clark County Commission Manager, by regular and certified return receipt mail with copies  
3 of the Order Granting Motion to Amend Preliminary Order of Forfeiture and the Notice.  
4 Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 10, 15-22, 149-150.

5 On January 18, 2024, the Internal Revenue Service personally served Kevin Schiller,  
6 Clark County Commission Manager, with copies of the Order Granting Motion to Amend  
7 Preliminary Order of Forfeiture and the Notice. Notice of Filing Service of Process –  
8 Personal Service, ECF No. 412-1, pg. 9, 32-39.

9 On January 11, 2024, the United States Attorney's Office served Justin Jones,  
10 County Commissioner; Southern Nevada Water Authority; and Vice Chair of Clark County  
11 Water Reclamation, by regular and certified return receipt mail with copies of the Order  
12 Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of  
13 Filing Service of Process – Mailing, ECF No. 424-1, pg. 10, 15-22, 143-144.

14 On January 18, 2024, the Internal Revenue Service personally served Justin Jones,  
15 County Commissioner; Southern Nevada Water Authority; and Vice Chair of Clark County  
16 Water Reclamation, with copies of the Order Granting Motion to Amend Preliminary  
17 Order of Forfeiture and the Notice. Notice of Filing Service of Process – Personal Service,  
18 ECF No. 412-1, pg. 10, 32-39.

19 On January 11, 2024, the United States Attorney's Office served Marilyn  
20 Kirkpatrick, Chair of Las Vegas Valley Water District; and Chair of Southern Nevada  
21 Water Authority, by regular and certified return receipt mail with copies of the Order  
22 Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of  
23 Filing Service of Process – Mailing, ECF No. 424-1, pg. 10, 15-22, 145-146.

24 On January 18, 2024, the Internal Revenue Service personally served Marilyn  
25 Kirkpatrick, Chair of Las Vegas Valley Water District; and Chair of Southern Nevada  
26 Water Authority, with copies of the Order Granting Motion to Amend Preliminary Order of  
27 Forfeiture and the Notice. Notice of Filing Service of Process – Personal Service, ECF No.  
28 412-1, pg. 11, 32-39.

1 On January 11, 2024, the United States Attorney's Office served John J. Entsminger,  
2 General Manager, Las Vegas Valley Water District and Southern Nevada Water Authority,  
3 by regular and certified return receipt mail with copies of the Order Granting Motion to  
4 Amend Preliminary Order of Forfeiture and the Notice. Notice of Filing Service of Process  
5 – Mailing, ECF No. 424-1, pg. 9, 15-22, 133-134.

6 On January 18, 2024, the Internal Revenue Service personally served John J.  
7 Entsminger, General Manager, Las Vegas Valley Water District and Southern Nevada  
8 Water Authority, with copies of the Order Granting Motion to Amend Preliminary Order of  
9 Forfeiture and the Notice. Notice of Filing Service of Process – Personal Service, ECF No.  
10 412-1, pg. 12, 32-39.

11 On January 11, 2024, the United States Attorney's Office served Gregory J. Walch,  
12 General Counsel Las Vegas Valley Water District and Southern Nevada Water Authority,  
13 by regular and certified return receipt mail with copies of the Order Granting Motion to  
14 Amend Preliminary Order of Forfeiture and the Notice. Notice of Filing Service of Process  
15 – Mailing, ECF No. 424-1, pg. 11, 15-22, 157-158.

16 On January 18, 2024, the Internal Revenue Service personally served Gregory J.  
17 Walch, General Counsel, Las Vegas Valley Water District and Southern Nevada Water  
18 Authority, with copies of the Order Granting Motion to Amend Preliminary Order of  
19 Forfeiture and the Notice. Notice of Filing Service of Process – Personal Service, ECF No.  
20 412-1, pg. 13, 32-39.

21 On January 11, 2024, the United States Attorney's Office served Dan Stewart, Vice  
22 Chair, Southern Nevada Water Authority, by regular and certified return receipt mail with  
23 copies of the Order Granting Motion to Amend Preliminary Order of Forfeiture and the  
24 Notice. Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 10, 15-22, 155-  
25 156.

26 On January 18, 2024, the Internal Revenue Service personally served Dan Stewart,  
27 Vice Chair, Southern Nevada Water Authority, with copies of the Order Granting Motion

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1 to Amend Preliminary Order of Forfeiture and the Notice. Notice of Filing Service of  
2 Process – Personal Service, ECF No. 412-1, pg. 14, 32-39.

3 On January 11, 2024, the United States Attorney's Office served the Southern  
4 Nevada Water Authority by regular and certified return receipt mail with copies of the  
5 Order Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice  
6 of Filing Service of Process – Mailing, ECF No. 424-1, pg. 10, 15-22, 153-154.

7 On January 18, 2024, the Internal Revenue Service personally served Olivia Diaz,  
8 Southern Nevada Water Authority, with copies of the Order Granting Motion to Amend  
9 Preliminary Order of Forfeiture and the Notice. Notice of Filing Service of Process –  
10 Personal Service, ECF No. 412-1, pg. 15, 32-39.

11 On January 11, 2024, the United States Attorney's Office served Tick Segerblom,  
12 Chairman of Clark County Water Reclamation and Vice-Chairman of the Clark County  
13 Commission, by regular and certified return receipt mail with copies of the Order Granting  
14 Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of Filing Service  
15 of Process – Mailing, ECF No. 424-1, pg. 10, 15-22, 151-152.

16 On January 18, 2024, the Internal Revenue Service personally served Tick  
17 Segerblom, Chairman of Clark County Water Reclamation and Vice-Chairman of the Clark  
18 County Commission, with copies of the Order Granting Motion to Amend Preliminary  
19 Order of Forfeiture and the Notice. Notice of Filing Service of Process – Personal Service,  
20 ECF No. 412-1, pg. 16, 32-39.

21 On January 11, 2024, the United States Attorney's Office served Jeff Dorocak, City  
22 Attorney, City of Las Vegas, by regular and certified return receipt mail with copies of the  
23 Order Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice  
24 of Filing Service of Process – Mailing, ECF No. 424-1, pg. 9, 15-22, 131-132.

25 On January 18, 2024, the Internal Revenue Service personally served Jeff Dorocak,  
26 City Attorney, City of Las Vegas, with copies of the Order Granting Motion to Amend  
27 Preliminary Order of Forfeiture and the Notice. Notice of Filing Service of Process –  
28 Personal Service, ECF No. 412-1, pg. 17, 32-39.



1 On January 11, 2024, the United States Attorney's Office served LuAnn Holmes,  
2 City Clerk, City Clerk of City of Las Vegas; and on behalf of City of Las Vegas Sewer, by  
3 regular and certified return receipt mail with copies of the Order Granting Motion to  
4 Amend Preliminary Order of Forfeiture and the Notice. Notice of Filing Service of Process  
5 – Mailing, ECF No. 424-1, pg. 9, 15-22, 139-140.

6 On January 18, 2024, the Internal Revenue Service personally served LuAnn  
7 Holmes, City Clerk, City Clerk of City of Las Vegas; and on behalf of City of Las Vegas  
8 Sewer, with copies of the Order Granting Motion to Amend Preliminary Order of Forfeiture  
9 and the Notice. Notice of Filing Service of Process – Personal Service, ECF No. 412-1, pg.  
10 18, 32-39.

11 On January 11, 2024, the United States Attorney's Office served Joey Paskey, Public  
12 Works Director of City of Las Vegas, by regular and certified return receipt mail with copies  
13 of the Order Granting Motion to Amend Preliminary Order of Forfeiture and the Notice.  
14 Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 10, 15-22, 147-148.

15 On January 18, 2024, the Internal Revenue Service personally served Joey Paskey,  
16 Public Works Director of City of Las Vegas, with copies of the Order Granting Motion to  
17 Amend Preliminary Order of Forfeiture and the Notice. Notice of Filing Service of Process  
18 – Personal Service, ECF No. 412-1, pg. 19, 32-39.

19 On January 11, 2024, the United States Attorney's Office attempted to serve  
20 Summerlin South Community Association, c/o Randy Ecklund, Registered Agent, at W.  
21 Charleston, by regular and certified return receipt mail with copies of the Order Granting  
22 Motion to Amend Preliminary Order of Forfeiture and the Notice. The regular mail and  
23 certified mail were both returned not deliverable as addressed –unable to forward. Notice of  
24 Filing Service of Process – Mailing, ECF No. 424-1, pg. 11, 15-22, 165-167.

25 On January 11, 2024, the United States Attorney's Office served Summerlin South  
26 Community Association, c/o Randy Ecklund, at Festival Plaza Drive by regular and  
27 certified return receipt mail with copies of the Order Granting Motion to Amend

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1 Preliminary Order of Forfeiture and the Notice. Notice of Filing Service of Process –  
2 Mailing, ECF No. 424-1, pg. 11, 15-22, 163-164.

3 On January 17, 2024, the Internal Revenue Service personally served Summerlin  
4 South Community Association, c/o Randy Ecklund, Registered Agent, with copies of the  
5 Order Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice  
6 of Filing Service of Process – Personal Service, ECF No. 412-1, pg. 20, 32-39.

7 On January 17, 2024, the Internal Revenue Service personally served Summerlin  
8 South Community Association, c/o Randy Ecklund, with copies of the Order Granting  
9 Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of Filing Service  
10 of Process – Personal Service, ECF No. 412-1, pg. 28, 32-39.

11 On January 11, 2024, the United States Attorney's Office served Summerlin South  
12 Community Association, c/o Vincent Esposito, President, by regular and certified return  
13 receipt mail with copies of the Order Granting Motion to Amend Preliminary Order of  
14 Forfeiture and the Notice. Notice of Filing Service of Process – Mailing, ECF No. 424-1,  
15 pg. 11, 15-22, 168-171.

16 On January 17, 2024, the Internal Revenue Service personally served Summerlin  
17 South Community Association, c/o Vincent Esposito, President, with copies of the Order  
18 Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of  
19 Filing Service of Process – Personal Service, ECF No. 412-1, pg. 21, 32-39.

20 On January 11, 2024, the United States Attorney's Office served Summerlin South  
21 Community Association, c/o Rachel Lyons, Secretary, by regular and certified return  
22 receipt mail with copies of the Order Granting Motion to Amend Preliminary Order of  
23 Forfeiture and the Notice. Notice of Filing Service of Process – Mailing, ECF No. 424-1,  
24 pg. 11, 15-22, 172-175.

25 On January 17, 2024, the Internal Revenue Service personally served Summerlin  
26 South Community Association, c/o Rachel Lyons, Secretary, with copies of the Order  
27 Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of  
28 Filing Service of Process – Personal Service, ECF No. 412-1, pg. 22, 32-39.

1 On January 11, 2024, the United States Attorney's Office served Summerlin South  
2 Community Association, c/o Linda Adams, Treasurer, by regular and certified return  
3 receipt mail with copies of the Order Granting Motion to Amend Preliminary Order of  
4 Forfeiture and the Notice. Notice of Filing Service of Process – Mailing, ECF No. 424-1,  
5 pg. 11, 15-22, 161-162.

6 On January 17, 2024, the Internal Revenue Service personally served Summerlin  
7 South Community Association, c/o Linda Adams, Treasurer, with copies of the Order  
8 Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of  
9 Filing Service of Process – Personal Service, ECF No. 412-1, pg. 23, 32-39.

10 On January 11, 2024, the United States Attorney's Office served Summerlin South  
11 Community Association, c/o Andreux Reynolds, Director, by regular and certified return  
12 receipt mail with copies of the Order Granting Motion to Amend Preliminary Order of  
13 Forfeiture and the Notice. Notice of Filing Service of Process – Mailing, ECF No. 424-1,  
14 pg. 12, 15-22, 184-187.

15 On January 17, 2024, the Internal Revenue Service personally served Summerlin  
16 South Community Association, c/o Andreux Reynolds, Director, with copies of the Order  
17 Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of  
18 Filing Service of Process – Personal Service, ECF No. 412-1, pg. 24, 32-39.

19 On January 11, 2024, the United States Attorney's Office served Summerlin South  
20 Community Association, c/o Jennifer Pevoto, Director, by regular and certified return  
21 receipt mail with copies of the Order Granting Motion to Amend Preliminary Order of  
22 Forfeiture and the Notice. Notice of Filing Service of Process – Mailing, ECF No. 424-1,  
23 pg. 12, 15-22, 176-179.

24 On January 17, 2024, the Internal Revenue Service personally served Summerlin  
25 South Community Association, c/o Jennifer Pevoto, Director, with copies of the Order  
26 Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of  
27 Filing Service of Process – Personal Service, ECF No. 412-1, pg. 25, 32-39.

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1 On January 11, 2024, the United States Attorney's Office served and attempted to  
2 serve Summerlin South Community Association, c/o Anthony Taeubel, Director, by  
3 regular and certified return receipt mail with copies of the Order Granting Motion to  
4 Amend Preliminary Order of Forfeiture and the Notice. The status of the certified mail is  
5 unknown as the post office has the document listed as in transit since January 17, 2024.  
6 Neither mailing was returned. Notice of Filing Service of Process – Mailing, ECF No. 424-  
7 1, pg. 12, 15-22, 192-195.

8 On January 17, 2024, the Internal Revenue Service personally served Summerlin  
9 South Community Association, c/o Anthony Taeubel, Director, with copies of the Order  
10 Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of  
11 Filing Service of Process – Personal Service, ECF No. 412-1, pg. 26, 32-39.

12 On January 11, 2024, the United States Attorney's Office served Summerlin South  
13 Community Association, c/o John West, by regular and certified return receipt mail with  
14 copies of the Order Granting Motion to Amend Preliminary Order of Forfeiture and the  
15 Notice. Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 12, 15-22, 196-  
16 197.

17 On January 17, 2024, the Internal Revenue Service personally served Summerlin  
18 South Community Association, c/o John West, with copies of the Order Granting Motion  
19 to Amend Preliminary Order of Forfeiture and the Notice. Notice of Filing Service of  
20 Process – Personal Service, ECF No. 412-1, pg. 27, 32-39.

21 On January 11, 2024, the United States Attorney's Office served Summerlin South  
22 Community Association, c/o Pamela Scott, Director, by regular and certified return receipt  
23 mail with copies of the Order Granting Motion to Amend Preliminary Order of Forfeiture  
24 and the Notice. Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 12, 15-22,  
25 188-191.

26 On January 17, 2024, the Internal Revenue Service personally served Summerlin  
27 South Community Association, c/o Pamela Scott, Director, with copies of the Order

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1 Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of  
2 Filing Service of Process – Personal Service, ECF No. 412-1, pg. 29, 32-39.

3 On January 11, 2024, the United States Attorney's Office served and attempted to  
4 serve Summerlin South Community Association, c/o David Redfearn, Director, by regular  
5 and certified return receipt mail with copies of the Order Granting Motion to Amend  
6 Preliminary Order of Forfeiture and the Notice. The status of the certified mail is unknown  
7 as the post office has the document listed as in transit since January 17, 2024. Neither  
8 mailing was returned. Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 12,  
9 15-22, 180-183.

10 On January 17, 2024, the Internal Revenue Service personally served Summerlin  
11 South Community Association, c/o David Redfearn, Director, with copies of the Order  
12 Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of  
13 Filing Service of Process – Personal Service, ECF No. 412-1, pg. 30, 32-39.

14 On January 11, 2024, the United States Attorney's Office served and attempted to  
15 serve Bradley Burns and Lori Burns by regular and certified return receipt mail with copies  
16 of the Order Granting Motion to Amend Preliminary Order of Forfeiture and the Notice.  
17 The regular mail was not returned. The certified mail was returned unclaimed, unable to  
18 forward. Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 3, 15-22, 24-26.

19 On January 11, 2024, the United States Attorney's Office served Kelly Douglas Card  
20 (or Carn, Jr.) at S. Eastern Avenue by regular and certified return receipt mail with copies of  
21 the Order Granting Motion to Amend Preliminary Order of Forfeiture and the Notice.  
22 Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 3, 15-22, 27-28.

23 On January 11, 2024, the United States Attorney's Office served and attempted to  
24 serve Kelly Douglas Card (or Carn, Jr.) at Radcliff Street by regular and certified return  
25 receipt mail with copies of the Order Granting Motion to Amend Preliminary Order of  
26 Forfeiture and the Notice. The regular mail was not returned. The certified mail was  
27 returned unclaimed, unable to forward. Notice of Filing Service of Process – Mailing, ECF  
28 No. 424-1, pg. 3, 15-22, 29-31.

1 On January 11, 2024, the United States Attorney's Office served Brent Lee Coralli by  
2 regular and certified return receipt mail with copies of the Order Granting Motion to  
3 Amend Preliminary Order of Forfeiture and the Notice. Notice of Filing Service of Process  
4 – Mailing, ECF No. 424-1, pg. 3, 15-22, 32-35.

5 On January 11, 2024, the United States Attorney's Office served the Estate of Larry  
6 Dean Coralli, c/o Brent Lee Coralli, by regular and certified return receipt mail with copies  
7 of the Order Granting Motion to Amend Preliminary Order of Forfeiture and the Notice.  
8 Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 4, 15-22, 36-39.

9 On January 11, 2024, the United States Attorney's Office attempted to serve Larry  
10 Dean Coralli by regular and certified return receipt mail with copies of the Order Granting  
11 Motion to Amend Preliminary Order of Forfeiture and the Notice. The regular mail and  
12 certified mail were both returned attempted – not known, unable to forward. Notice of  
13 Filing Service of Process – Mailing, ECF No. 424-1, pg. 4, 15-22, 40-42.

14 On January 11, 2024, the United States Attorney's Office served Lucia Garanin or  
15 Costin or Aranin or Yaramin at zip code 98029 by regular and certified return receipt mail  
16 with copies of the Order Granting Motion to Amend Preliminary Order of Forfeiture and  
17 the Notice. Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 4, 15-22, 43-  
18 44.

19 On January 11, 2024, the United States Attorney's Office served and attempted to  
20 serve Lucia Garanin or Costin or Aranin or Yaramin at zip code 98321 by regular and  
21 certified return receipt mail with copies of the Order Granting Motion to Amend  
22 Preliminary Order of Forfeiture and the Notice. The status of the certified mail is unknown  
23 as the post office has the document listed as in transit unclaimed being returned to sender.  
24 Neither mailing was returned. Notice of Filing Service of Process – Mailing, ECF No. 424-  
25 1, pg. 4, 15-22, 45-48.

26 On January 11, 2024, the United States Attorney's Office served Jeffrey Haeberlin,  
27 by regular and certified return receipt mail with copies of the Order Granting Motion to  
28 / / /

1 Amend Preliminary Order of Forfeiture and the Notice. Notice of Filing Service of Process  
2 – Mailing, ECF No. 424-1, pg. 4, 15-22, 49-50.

3 On January 11, 2024, the United States Attorney's Office served Nicole Hurbace /  
4 Nicole Gaudioso at Reynolds Avenue by regular and certified return receipt mail with  
5 copies of the Order Granting Motion to Amend Preliminary Order of Forfeiture and the  
6 Notice. Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 4, 15-22, 51-52.

7 On January 11, 2024, the United States Attorney's Office served Nicole Hurbace /  
8 Nicole Gaudioso at Moonlight View Court by regular and certified return receipt mail with  
9 copies of the Order Granting Motion to Amend Preliminary Order of Forfeiture and the  
10 Notice. Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 4, 15-22, 53-54.

11 On January 11, 2024, the United States Attorney's Office attempted to serve Nicole  
12 Hurbace / Nicole Gaudioso at Ten Gallon Court by regular and certified return receipt mail  
13 with copies of the Order Granting Motion to Amend Preliminary Order of Forfeiture and  
14 the Notice. The regular mail and certified mail were both returned attempted – not known,  
15 unable to forward. Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 4-5,  
16 15-22, 55-57.

17 On January 11, 2024, the United States Attorney's Office attempted to serve Nicole  
18 Hurbace / Nicole Gaudioso at Chestnut Ridge Circle by regular and certified return receipt  
19 mail with copies of the Order Granting Motion to Amend Preliminary Order of Forfeiture  
20 and the Notice. The regular mail and certified mail were both returned attempted – not  
21 known, unable to forward. Notice of Filing Service of Process – Mailing, ECF No. 424-1,  
22 pg. 5, 15-22, 58-60.

23 On January 11, 2024, the United States Attorney's Office served PITARO &  
24 FUMO, CHTD., Osvaldo E Fumo, Attorney for Phillip D. Hurbace, by regular and  
25 certified return receipt mail with copies of the Order Granting Motion to Amend  
26 Preliminary Order of Forfeiture and the Notice. Notice of Filing Service of Process –  
27 Mailing, ECF No. 424-1, pg. 5, 15-22, 61-62.

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1 On January 11, 2024, the United States Attorney's Office served and attempted to  
2 serve Phillip Hurbace at 1035 Mountain Quail Road by regular and certified return receipt  
3 mail with copies of the Order Granting Motion to Amend Preliminary Order of Forfeiture  
4 and the Notice. The regular mail was not returned. The certified mail was returned  
5 unclaimed, unable to forward. Notice of Filing Service of Process – Mailing, ECF No. 424-  
6 1, pg. 5, 15-22, 63-65.

7 On January 11, 2024, the United States Attorney's Office served and attempted to  
8 serve Phillip Hurbace at 1055 Mountain Quail Road by regular and certified return receipt  
9 mail with copies of the Order Granting Motion to Amend Preliminary Order of Forfeiture  
10 and the Notice. The regular mail was not returned. The certified mail was returned  
11 unclaimed, unable to forward. Notice of Filing Service of Process – Mailing, ECF No. 424-  
12 1, pg. 5, 15-22, 66-68.

13 On January 11, 2024, the United States Attorney's Office attempted to serve Phillip  
14 Hurbace at Oakhill Avenue by regular and certified return receipt mail with copies of the  
15 Order Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. The  
16 regular mail and certified mail were both returned attempted – not known, unable to  
17 forward. Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 5, 15-22, 69-71.

18 On January 11, 2024, the United States Attorney's Office served Vicki Hurbace by  
19 regular and certified return receipt mail with copies of the Order Granting Motion to  
20 Amend Preliminary Order of Forfeiture and the Notice. Notice of Filing Service of Process  
21 – Mailing, ECF No. 424-1, pg. 5, 15-22, 72-73.

22 On January 11, 2024, the United States Attorney's Office served the Estate of Carl  
23 Kenneth Hurst, c/o Teresa Hurst, by regular and certified return receipt mail with copies of  
24 the Order Granting Motion to Amend Preliminary Order of Forfeiture and the Notice.  
25 Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 6, 15-22, 74-75.

26 On January 11, 2024, the United States Attorney's Office served and attempted to  
27 serve Carl Kenneth Hurst by regular and certified return receipt mail with copies of the  
28 Order Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. The

1 regular mail was not returned. The certified mail was returned not deliverable as addressed,  
2 unable to forward. Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 6, 15-  
3 22, 76-78.

4 On January 11, 2024, the United States Attorney's Office served Teresa Hurst by  
5 regular and certified return receipt mail with copies of the Order Granting Motion to  
6 Amend Preliminary Order of Forfeiture and the Notice. Notice of Filing Service of Process  
7 – Mailing, ECF No. 424-1, pg. 6, 15-22, 79-80.

8 On January 11, 2024, the United States Attorney's Office served Larry Anthony  
9 McDaniel by regular and certified return receipt mail with copies of the Order Granting  
10 Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of Filing Service  
11 of Process – Mailing, ECF No. 424-1, pg. 6, 15-22, 81-82.

12 On January 11, 2024, the United States Attorney's Office attempted to serve HILL  
13 FIRM, Daniel Hill, Attorney for Larry Anthony McDaniel, by regular and certified return  
14 receipt mail with copies of the Order Granting Motion to Amend Preliminary Order of  
15 Forfeiture and the Notice. The regular mail and certified mail were both returned illegible,  
16 unable to forward. Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 6, 15-  
17 22, 83-85.

18 On January 11, 2024, the United States Attorney's Office served and attempted to  
19 serve Gloria Rodney at PO Box 284 by regular and certified return receipt mail with copies  
20 of the Order Granting Motion to Amend Preliminary Order of Forfeiture and the Notice.  
21 The regular mail was not returned. The certified mail was returned unclaimed, unable to  
22 forward. Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 6, 15-22, 86-88.

23 On January 11, 2024, the United States Attorney's Office served and attempted to  
24 serve Gloria Rodney at Mountain Quail Road by regular and certified return receipt mail  
25 with copies of the Order Granting Motion to Amend Preliminary Order of Forfeiture and  
26 the Notice. The regular mail was not returned. The certified mail was returned unclaimed,  
27 unable to forward. Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 6-7,  
28 15-22, 89-91.



1 On January 11, 2024, the United States Attorney's Office served Kerin Schroeder by  
2 regular and certified return receipt mail with copies of the Order Granting Motion to  
3 Amend Preliminary Order of Forfeiture and the Notice. Notice of Filing Service of Process  
4 – Mailing, ECF No. 424-1, pg. 7, 15-22, 92-93.

5 On January 11, 2024, the United States Attorney's Office served and attempted to  
6 serve Melinda Sebasovich at zip code 32082 by regular and certified return receipt mail with  
7 copies of the Order Granting Motion to Amend Preliminary Order of Forfeiture and the  
8 Notice. The status of the certified mail is unknown as the post office has the document listed  
9 as in transit since January 21, 2024. Neither mailing was returned. Lexis Public Records,  
10 Westlaw Public Records, and Accurint all list this location as her current location. Notice of  
11 Filing Service of Process – Mailing, ECF No. 424-1, pg. 7, 15-22, 94-97.

12 On January 11, 2024, the United States Attorney's Office attempted to serve Melinda  
13 Sebasovich at zip code 32063 by regular and certified return receipt mail with copies of the  
14 Order Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. The  
15 regular mail and certified mail were both returned not deliverable as addressed, unable to  
16 forward. Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 7, 15-22, 98-101.

17 On January 11, 2024, the United States Attorney's Office attempted to serve Melinda  
18 Sebasovich at zip code 89109 by regular and certified return receipt mail with copies of the  
19 Order Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. The  
20 regular mail and certified mail were both returned attempted – not known, unable to  
21 forward. Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 7, 15-22, 102-  
22 104.

23 On January 11, 2024, the United States Attorney's Office attempted to serve Melinda  
24 Sebasovich at zip code 89074, by regular and certified return receipt mail with copies of the  
25 Order Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. The  
26 regular mail was returned attempted – not known, unable to forward. The certified mail was  
27 returned insufficient address, unable to forward. Notice of Filing Service of Process –  
28 Mailing, ECF No. 424-1, pg. 7, 15-22, 105-107.

1 On January 11, 2024, the United States Attorney's Office served Perry Stasi at  
2 Anthem Village Drive by regular and certified return receipt mail with copies of the Order  
3 Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of  
4 Filing Service of Process – Mailing, ECF No. 424-1, pg. 7, 15-22, 108-109.

5 On January 11, 2024, the United States Attorney's Office served Perry Stasi at Villa  
6 Rica Drive by regular and certified return receipt mail with copies of the Order Granting  
7 Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of Filing Service  
8 of Process – Mailing, ECF No. 424-1, pg. 8, 15-22, 110-111.

9 On January 11, 2024, the United States Attorney's Office served and attempted to  
10 serve Perry Stasi at Canvas Edge Drive by regular and certified return receipt mail with  
11 copies of the Order Granting Motion to Amend Preliminary Order of Forfeiture and the  
12 Notice. The regular mail was not returned. The certified mail was returned not deliverable  
13 as addressed, unable to forward. Notice of Filing Service of Process – Mailing, ECF No.  
14 424-1, pg. 8, 15-22, 112-114.

15 On January 11, 2024, the United States Attorney's Office served Todd Vowell at zip  
16 code 84790 by regular and certified return receipt mail with copies of the Order Granting  
17 Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of Filing Service  
18 of Process – Mailing, ECF No. 424-1, pg. 8, 15-22, 115-116.

19 On January 11, 2024, the United States Attorney's Office served and attempted to  
20 serve Todd Vowell at zip code 84770 by regular and certified return receipt mail with copies  
21 of the Order Granting Motion to Amend Preliminary Order of Forfeiture and the Notice.  
22 The regular mail was returned attempted – not known, unable to forward. The certified mail  
23 return receipt was returned signed. Notice of Filing Service of Process – Mailing, ECF No.  
24 424-1, pg. 8, 15-22, 117-119.

25 On January 11, 2024, the United States Attorney's Office served Robert Leroy Wolfe  
26 (or Kaufman) at zip code 89149 by regular and certified return receipt mail with copies of  
27 the Order Granting Motion to Amend Preliminary Order of Forfeiture and the Notice.  
28 Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 8, 15-22, 120-121.

On January 11, 2024, the United States Attorney's Office served Robert Leroy Wolfe (or Kaufman) at zip code 89131 by regular and certified return receipt mail with copies of the Order Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 8, 15-22, 122-123.

On January 11, 2024, the United States Attorney's Office attempted to serve Robert Leroy Wolfe (or Kaufman) at zip code 89044 by regular and certified return receipt mail with copies of the Order Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. The regular mail and certified mail were both returned no such number, unable to forward. Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 8, 15-22, 124-126.

On January 22, 2024, the United States Attorney's Office served Deborah Mayers by regular and certified return receipt mail with copies of the Order Granting Motion to Amend Preliminary Order of Forfeiture and the Notice. Notice of Filing Service of Process – Mailing, ECF No. 424-1, pg. 13, 15-22, 198-200.

### **Substitution and Forfeiture**

On November 13, 2023, the United States filed an Unopposed Motion to Substitute and to Forfeit Property of Sylviane Della Whitmore, a/k/a Cordova's 3189 Pinehurst Dr., Unit C, (Motion to Substitute), ECF No. 360<sup>1</sup>.

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<sup>1</sup> Real property located at 3189 Pinehurst Drive, Unit C, Las Vegas, Nevada 89109, more particularly described as:  
 PARCEL I: UNIT "C," BUILDING ELEVEN (11) OF LAS VEGAS INTERNATIONAL COUNTRY CLUB ESTATES - TOWNHOME CONDOMINIUMS - PHASE 1, AS SHOWN BY MAP THEREOF ON FILE IN BOOK 14 OF PLATS, PAGE 10, IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY, NEVADA.  
 PARCEL II: AN UNDIVIDED 1/47TH INTEREST IN AND TO THE COMMON AREAS TOGETHER WITH AN EXCLUSIVE EASEMENT TO USE PARKING SPACE NO. 11-C OF LAS VEGAS INTERNATIONAL COUNTRY CLUB ESTATES - TOWNHOUSE CONDOMINIUMS PHASE ONE, AS THE SAME IS ESTABLISHED IN THE PLAN RECORDED IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY, NEVADA, IN BOOK 14, PAGE 10, AND AS AMENDED IN BOOK 205, PAGE 164, AND THE DECLARATION OF COVENANTS, CONDITIONS AND RESTRICTIONS RECORDED IN THE OFFICE OF THE COUNTY RECORDER OF CLARK COUNTY, NEVADA, OFFICIAL RECORDS, BOOK 206, AS DOCUMENT NO. 165836;

1 On November 13, 2023, this Court granted the Motion to Substitute, ECF No. 362.

2 This Court finds the United States published the notice of forfeiture in accordance  
3 with the law via the official government internet forfeiture site, [www.forfeiture.gov](http://www.forfeiture.gov),  
4 consecutively from November 23, 2023, through December 22, 2023, notifying all potential  
5 third parties of their right to petition the Court. Notice of Filing Proof of Publication  
6 Exhibits, ECF No. 388-1, p. 5.

7 This Court finds the United States notified known third parties by personal service  
8 and by regular mail and certified mail return receipt requested of their right to petition the  
9 Court. Notice of Filing Service of Process – Personal Service, ECF No. 413; Notice of Filing  
10 Service of Process – Mailing, ECF No. 425.

11 On January 11, 2024, the United States Attorney's Office served Briana Johnson,  
12 Clark County Assessor, by regular and certified return receipt mail with copies of the  
13 Substitution and Forfeiture Order and the Notice. Notice of Filing Service of Process –  
14 Mailing, ECF No. 425-1, pg. 9, 15-21, 147-148.

15 On January 18, 2024, the Internal Revenue Service personally served Briana  
16 Johnson, Clark County Assessor, with copies of the Substitution and Forfeiture Order and  
17 the Notice. Notice of Filing Service of Process – Personal Service, ECF No. 413-1, pg. 3, 33-  
18 39.

19 On January 11, 2024, the United States Attorney's Office served Lynn Marie Goya,  
20 Clark County Clerk and on behalf of Clark County Water Reclamation District; the  
21 Commission Division; the Clark County Board of Commissioners; the Southern Nevada  
22 Water Authority; and the Las Vegas Valley Water District, by regular and certified return  
23

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24 PARCEL III: THE FOLLOWING APPURTENANT EASEMENT: AN EXCLUSIVE  
25 EASEMENT FOR INGRESS AND EGRESS OVER CERTAIN STREETS CREATED  
26 IN THE DECLARATION OF EASEMENTS, RIGHTS, CONDITIONS AND  
27 RESTRICTIONS RECORDED IN BOOK 941 AS INSTRUMENT NO. 755353 AND IN  
28 THE DECLARATION OF EASEMENTS, RIGHTS, CONDITIONS AND  
RESTRICTIONS RECORDED IN BOOK 941 AS INSTRUMENT NO. 755358,  
TOGETHER WITH ALL IMPROVEMENTS AND APPURTENANCES THEREON;  
APN: 162-10-717-042

1 receipt mail with copies of the Substitution and Forfeiture Order and the Notice. Notice of  
2 Filing Service of Process – Mailing, ECF No. 425-1, pg. 9, 15-21, 143-144.

3 On January 18, 2024, the Internal Revenue Service personally served Lynn Marie  
4 Goya, Clark County Clerk and on behalf of Clark County Water Reclamation District; the  
5 Commission Division; the Clark County Board of Commissioners; the Southern Nevada  
6 Water Authority; and the Las Vegas Valley Water District, with copies of the Substitution  
7 and Forfeiture Order and the Notice. Notice of Filing Service of Process – Personal Service,  
8 ECF No. 413-1, pg. 4, 33-39.

9 On January 11, 2024, the United States Attorney's Office served Steven B. Wolfson,  
10 Clark County District Attorney, by regular and certified return receipt mail with copies of  
11 the Substitution and Forfeiture Order and the Notice. Notice of Filing Service of Process –  
12 Mailing, ECF No. 425-1, pg. 10, 15-21, 163-164.

13 On January 18, 2024, the Internal Revenue Service personally served Steven B.  
14 Wolfson, Clark County District Attorney, with copies of the Substitution and Forfeiture  
15 Order and the Notice. Notice of Filing Service of Process – Personal Service, ECF No. 413-  
16 1, pg. 5, 33-39.

17 On January 11, 2024, the United States Attorney's Office served Debbie Conway,  
18 Clark County Recorder, by regular and certified return receipt mail with copies of the  
19 Substitution and Forfeiture Order and the Notice. Notice of Filing Service of Process –  
20 Mailing, ECF No. 425-1, pg. 8, 15-21, 131-132.

21 On January 18, 2024, the Internal Revenue Service personally served Debbie  
22 Conway, Clark County Recorder, with copies of the Substitution and Forfeiture Order and  
23 the Notice. Notice of Filing Service of Process – Personal Service, ECF No. 413-1, pg. 6, 33-  
24 39.

25 On January 11, 2024, the United States Attorney's Office served J. Ken Diaz, Clark  
26 County Treasurer, by regular and certified return receipt mail with copies of the Substitution  
27 and Forfeiture Order and the Notice. Notice of Filing Service of Process – Mailing, ECF  
28 No. 425-1, pg. 8, 15-21, 133-134.

1 On January 18, 2024, the Internal Revenue Service personally served J. Ken Diaz,  
2 Clark County Treasurer, with copies of the Substitution and Forfeiture Order and the  
3 Notice. Notice of Filing Service of Process – Personal Service, ECF No. 413-1, pg. 7, 33-39.

4 On January 11, 2024, the United States Attorney's Office served James B. Gibson,  
5 Chair of Clark County Commission; Vice President of Southern Nevada Water Authority;  
6 and Vice President of Las Vegas Valley Water District, by regular and certified return  
7 receipt mail with copies of the Substitution and Forfeiture Order and the Notice. Notice of  
8 Filing Service of Process – Mailing, ECF No. 425-1, pg. 9, 15-21, 141-142.

9 On January 18, 2024, the Internal Revenue Service personally served James B.  
10 Gibson, Chair of Clark County Commission; Vice President of Southern Nevada Water  
11 Authority; and Vice President of Las Vegas Valley Water District, with copies of the  
12 Substitution and Forfeiture Order and the Notice. Notice of Filing Service of Process –  
13 Personal Service, ECF No. 413-1, pg. 8, 33-39.

14 On January 11, 2024, the United States Attorney's Office served Kevin Schiller,  
15 Clark County Commission Manager, by regular and certified return receipt mail with copies  
16 of the Substitution and Forfeiture Order and the Notice. Notice of Filing Service of Process  
17 – Mailing, ECF No. 425-1, pg. 10, 15-21, 155-156.

18 On January 18, 2024, the Internal Revenue Service personally served Kevin Schiller,  
19 Clark County Commission Manager, with copies of the Substitution and Forfeiture Order  
20 and the Notice. Notice of Filing Service of Process – Personal Service, ECF No. 413-1, pg.  
21 9, 33-39.

22 On January 11, 2024, the United States Attorney's Office served Justin Jones,  
23 County Commissioner; Southern Nevada Water Authority; and Vice Chair of Clark County  
24 Water Reclamation, by regular and certified return receipt mail with copies of the  
25 Substitution and Forfeiture Order and the Notice. Notice of Filing Service of Process –  
26 Mailing, ECF No. 425-1, pg. 9, 15-21, 149-150.

27 On January 18, 2024, the Internal Revenue Service personally served Justin Jones,  
28 County Commissioner; Southern Nevada Water Authority; and Vice Chair of Clark County



1 Water Reclamation, with copies of the Substitution and Forfeiture Order and the Notice.  
2 Notice of Filing Service of Process – Personal Service, ECF No. 413-1, pg. 10, 33-39.

3 On January 11, 2024, the United States Attorney’s Office served Marilyn  
4 Kirkpatrick, Chair of Las Vegas Valley Water District; and Chair of Southern Nevada  
5 Water Authority, by regular and certified return receipt mail with copies of the Substitution  
6 and Forfeiture Order and the Notice. Notice of Filing Service of Process – Mailing, ECF  
7 No. 425-1, pg. 9, 15-21, 151-152.

8 On January 18, 2024, the Internal Revenue Service personally served Marilyn  
9 Kirkpatrick, Chair of Las Vegas Valley Water District; and Chair of Southern Nevada  
10 Water Authority, with copies of the Substitution and Forfeiture Order and the Notice.  
11 Notice of Filing Service of Process – Personal Service, ECF No. 413-1, pg. 11, 33-39.

12 On January 11, 2024, the United States Attorney’s Office served John J. Entsminger,  
13 General Manager, Las Vegas Valley Water District and Southern Nevada Water Authority,  
14 by regular and certified return receipt mail with copies of the Substitution and Forfeiture  
15 Order and the Notice. Notice of Filing Service of Process – Mailing, ECF No. 425-1, pg. 8-  
16 9, 15-21, 139-140.

17 On January 18, 2024, the Internal Revenue Service personally served John J.  
18 Entsminger, General Manager, Las Vegas Valley Water District and Southern Nevada  
19 Water Authority, with copies of the Substitution and Forfeiture Order and the Notice.  
20 Notice of Filing Service of Process – Personal Service, ECF No. 413-1, pg. 12, 33-39.

21 On January 11, 2024, the United States Attorney’s Office served Gregory J. Walch,  
22 General Counsel, Las Vegas Valley Water District and Southern Nevada Water Authority,  
23 by regular and certified return receipt mail with copies of the Substitution and Forfeiture  
24 Order and the Notice. Notice of Filing Service of Process – Mailing, ECF No. 425-1, pg. 10,  
25 15-21, 161-162.

26 On January 18, 2024, the Internal Revenue Service personally served Gregory J.  
27 Walch, General Counsel, Las Vegas Valley Water District and Southern Nevada Water  
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1 Authority, with copies of the Substitution and Forfeiture Order and the Notice. Notice of  
2 Filing Service of Process – Personal Service, ECF No. 413-1, pg. 13, 33-39.

3 On January 11, 2024, the United States Attorney’s Office served Dan Stewart, Vice  
4 Chair, Southern Nevada Water Authority, by regular and certified return receipt mail with  
5 copies of the Substitution and Forfeiture Order and the Notice. Notice of Filing Service of  
6 Process – Mailing, ECF No. 425-1, pg. 10, 15-21, 159-160.

7 On January 18, 2024, the Internal Revenue Service personally served Dan Stewart,  
8 Vice Chair, Southern Nevada Water Authority, with copies of the Substitution and  
9 Forfeiture Order and the Notice. Notice of Filing Service of Process – Personal Service,  
10 ECF No. 413-1, pg. 14, 33-39.

11 On January 11, 2024, the United States Attorney’s Office served Olivia Diaz,  
12 Southern Nevada Water Authority, by regular and certified return receipt mail with copies  
13 of the Substitution and Forfeiture Order and the Notice. Notice of Filing Service of Process  
14 – Mailing, ECF No. 425-1, pg. 8, 15-21, 135-136.

15 On January 18, 2024, the Internal Revenue Service personally served Olivia Diaz,  
16 Southern Nevada Water Authority, with copies of the Substitution and Forfeiture Order  
17 and the Notice. Notice of Filing Service of Process – Personal Service, ECF No. 413-1, pg.  
18 15, 33-39.

19 On January 11, 2024, the United States Attorney’s Office served Tick Segerblom,  
20 Chairman of Clark County Water Reclamation and Vice-Chairman of the Clark County  
21 Commission, by regular and certified return receipt mail with copies of the Substitution and  
22 Forfeiture Order and the Notice. Notice of Filing Service of Process – Mailing, ECF No.  
23 425-1, pg. 10, 15-21, 157-158.

24 On January 18, 2024, the Internal Revenue Service personally served Tick  
25 Segerblom, Chairman of Clark County Water Reclamation and Vice-Chairman of the Clark  
26 County Commission, with copies of the Substitution and Forfeiture Order and the Notice.  
27 Notice of Filing Service of Process – Personal Service, ECF No. 413-1, pg. 16, 33-39.

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1 On January 11, 2024, the United States Attorney's Office served Jeff Dorocak, City  
2 Attorney, City of Las Vegas, by regular and certified return receipt mail with copies of the  
3 Substitution and Forfeiture Order and the Notice. Notice of Filing Service of Process –  
4 Mailing, ECF No. 425-1, pg. 8, 15-21, 137-138.

5 On January 18, 2024, the Internal Revenue Service personally served Jeff Dorocak,  
6 City Attorney, City of Las Vegas, with copies of the Substitution and Forfeiture Order and  
7 the Notice. Notice of Filing Service of Process – Personal Service, ECF No. 413-1, pg. 17,  
8 33-39.

9 On January 11, 2024, the United States Attorney's Office served LuAnn Holmes,  
10 City Clerk, City Clerk of City of Las Vegas; and on behalf of City of Las Vegas Sewer, by  
11 regular and certified return receipt mail with copies of the Substitution and Forfeiture Order  
12 and the Notice. Notice of Filing Service of Process – Mailing, ECF No. 425-1, pg. 9, 15-21,  
13 145-146.

14 On January 18, 2024, the Internal Revenue Service personally served LuAnn  
15 Holmes, City Clerk, City Clerk of City of Las Vegas; and on behalf of City of Las Vegas  
16 Sewer, with copies of the Substitution and Forfeiture Order and the Notice. Notice of Filing  
17 Service of Process – Personal Service, ECF No. 413-1, pg. 18, 33-39.

18 On January 11, 2024, the United States Attorney's Office served Joey Paskey, Public  
19 Works Director of City of Las Vegas, by regular and certified return receipt mail with copies  
20 of the Substitution and Forfeiture Order and the Notice. Notice of Filing Service of Process  
21 – Mailing, ECF No. 425-1, pg. 10, 15-21, 153-154.

22 On January 18, 2024, the Internal Revenue Service personally served Joey Paskey,  
23 Public Works Director of City of Las Vegas Sewer, with copies of the Substitution and  
24 Forfeiture Order and the Notice. Notice of Filing Service of Process – Personal Service,  
25 ECF No. 413-1, pg. 19, 33-39.

26 On January 11, 2024, the United States Attorney's Office served and attempted to  
27 serve Quadro Homeowners' Association, Sierra Community Management LLC, Registered  
28 Agent, c/o Mandy Endelman, by regular and certified return receipt mail with copies of the

1 Substitution and Forfeiture Order and the Notice. The status of the certified mail is  
2 unknown as the post office has the document listed as in transit since January 17, 2024.  
3 Neither mailing was returned. Notice of Filing Service of Process – Mailing, ECF No. 425-  
4 1, pg. 11-12, 15-21, 183-186.

5 On January 17, 2024, the Internal Revenue Service personally served Quadro  
6 Homeowners' Association, Sierra Community Management LLC, Registered Agent, c/o  
7 Mandy Endelman, with copies of the Substitution and Forfeiture Order and the Notice.  
8 Notice of Filing Service of Process – Personal Service, ECF No. 413-1, pg. 20, 33-39.

9 On January 11, 2024, the United States Attorney's Office served and attempted to  
10 serve Quadro Homeowners' Association, c/o Linda Newport, Director, by regular and  
11 certified return receipt mail with copies of the Substitution and Forfeiture Order and the  
12 Notice. The regular mail was not returned. The certified mail was returned as attempted –  
13 not known unable to forward. Notice of Filing Service of Process – Mailing, ECF No. 425-  
14 1, pg. 12, 15-21, 196-198.

15 On January 17, 2024, the Internal Revenue Service personally served Quadro  
16 Homeowners' Association c/o Linda Newport, Director, with copies of the Substitution  
17 and Forfeiture Order and the Notice. Notice of Filing Service of Process – Personal Service,  
18 ECF No. 413-1, pg. 21, 33-39.

19 On January 11, 2024, the United States Attorney's Office attempted to serve Quadro  
20 Homeowners' Association, c/o Elena Lungu, President, by regular and certified return  
21 receipt mail with copies of the Substitution and Forfeiture Order and the Notice. The  
22 regular mail was returned as insufficient address unable to forward. The certified mail was  
23 returned as attempted – not known unable to forward. Notice of Filing Service of Process –  
24 Mailing, ECF No. 425-1, pg. 12, 15-21, 193-195.

25 On January 17, 2024, the Internal Revenue Service personally served Quadro  
26 Homeowners' Association c/o Elena Lungu, President, with copies of the Substitution and  
27 Forfeiture Order and the Notice. Notice of Filing Service of Process – Personal Service,  
28 ECF No. 413-1, pg. 22, 33-39.

1 On January 11, 2024, the United States Attorney's Office attempted to serve Quadro  
2 Homeowners' Association, c/o RJ Hunziker, Director, by regular and certified return  
3 receipt mail with copies of the Substitution and Forfeiture Order and the Notice. The  
4 regular mail was returned as insufficient address unable to forward. The certified mail was  
5 returned as attempted – not known unable to forward. Notice of Filing Service of Process –  
6 Mailing, ECF No. 425-1, pg. 12, 15-21, 190-192.

7 On January 17, 2024, the Internal Revenue Service attempted to serve Quadro  
8 Homeowners' Association c/o RJ Hunziker, Director, with copies of the Substitution and  
9 Forfeiture Order and the Notice. RJ Hunziker was no longer the Director. Notice of Filing  
10 Service of Process – Personal Service, ECF No. 413-1, pg. 23, 33-39.

11 On January 11, 2024, the United States Attorney's Office attempted to serve Quadro  
12 Homeowners' Association, c/o Jonathan Hamrick, Secretary, by regular and certified  
13 return receipt mail with copies of the Substitution and Forfeiture Order and the Notice. The  
14 regular mail was returned as insufficient address unable to forward. The certified mail was  
15 returned as attempted – not known unable to forward. Notice of Filing Service of Process –  
16 Mailing, ECF No. 425-1, pg. 12, 15-21, 187-189.

17 On January 17, 2024, the Internal Revenue Service personally served Quadro  
18 Homeowners' Association c/o Jonathan Hamrick, Secretary, with copies of the Substitution  
19 and Forfeiture Order and the Notice. Notice of Filing Service of Process – Personal Service,  
20 ECF No. 413-1, pg. 24, 33-39.

21 On January 11, 2024, the United States Attorney's Office served and attempted to  
22 serve Sierra Community Management LLC, Sierra Community Management LLC,  
23 Registered Agent, c/o Mandy Endelman, by regular and certified return receipt mail with  
24 the Notice and the Substitution and Forfeiture Order. The status of the certified mail is  
25 unknown as the post office has the document listed as in transit since January 17, 2024.  
26 Neither mailing was returned. Notice of Filing Service of Process – Mailing, ECF No. 425-  
27 1, pg. 11, 15-21, 179-182.

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1 On January 17, 2024, the Internal Revenue Service personally served Sierra  
2 Community Management LLC, Sierra Community Management LLC, Registered Agent  
3 c/o Mandy Endelman, with copies of the Substitution and Forfeiture Order and the Notice.  
4 Notice of Filing Service of Process – Personal Service, ECF No. 413-1, pg. 25, 33-39.

5 On January 11, 2024, the United States Attorney's Office served Las Vegas  
6 International Country Club Estates Home Owners Association, Inc., c/o Gemma Sladky,  
7 Registered Agent, by regular and certified return receipt mail with copies of the Substitution  
8 and Forfeiture Order and the Notice. Notice of Filing Service of Process – Mailing, ECF  
9 No. 425-1, pg. 11, 15-21, 175-176.

10 On January 18, 2024, the Internal Revenue Service personally served Las Vegas  
11 International Country Club Estates Home Owners Association, Inc., c/o Gemma Sladky,  
12 Registered Agent, with copies of the Substitution and Forfeiture Order and the Notice.  
13 Notice of Filing Service of Process – Personal Service, ECF No. 413-1, pg. 26, 33-39.

14 On January 11, 2024, the United States Attorney's Office served Las Vegas  
15 International Country Club Estates Home Owners Association, Inc., c/o Bette Leal,  
16 Secretary, by regular and certified return receipt mail with copies of the Substitution and  
17 Forfeiture Order and the Notice. Notice of Filing Service of Process – Mailing, ECF No.  
18 425-1, pg. 11, 15-21, 170-171.

19 On January 18, 2024, the Internal Revenue Service personally served Las Vegas  
20 International Country Club Estates Home Owners Association, Inc., c/o Bette Leal,  
21 Secretary, with copies of the Substitution and Forfeiture Order and the Notice. Notice of  
22 Filing Service of Process – Personal Service, ECF No. 413-1, pg. 27, 33-39.

23 On January 11, 2024, the United States Attorney's Office served Las Vegas  
24 International Country Club Estates Home Owners Association, Inc., c/o Jill Knowland,  
25 Treasurer, by regular and certified return receipt mail with copies of the Substitution and  
26 Forfeiture Order and the Notice. Notice of Filing Service of Process – Mailing, ECF No.  
27 425-1, pg. 10-11, 15-21, 168-169.

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1 On January 18, 2024, the Internal Revenue Service personally served Las Vegas  
2 International Country Club Estates Home Owners Association, Inc., c/o Jill Knowland,  
3 Treasurer, with copies of the Substitution and Forfeiture Order and the Notice. Notice of  
4 Filing Service of Process – Personal Service, ECF No. 413-1, pg. 28, 33-39.

5 On January 11, 2024, the United States Attorney's Office served and attempted to  
6 serve Las Vegas International Country Club Estates Home Owners Association, Inc., c/o  
7 Gina Rucker, Director, by regular and certified return receipt mail with copies of the  
8 Substitution and Forfeiture Order and the Notice. The regular mail was returned as no mail  
9 receptacle unable to forward. The certified mail return receipt was returned signed. Notice  
10 of Filing Service of Process – Mailing, ECF No. 425-1, pg. 11, 15-21, 172-174.

11 On January 18, 2024, the Internal Revenue Service personally served Las Vegas  
12 International Country Club Estates Home Owners Association, Inc., c/o Gina Rucker,  
13 Director, with copies of the Substitution and Forfeiture Order and the Notice. Notice of  
14 Filing Service of Process – Personal Service, ECF No. 413-1, pg. 29, 33-39.

15 On January 11, 2024, the United States Attorney's Office served and attempted to  
16 serve Las Vegas International Country Club Estates Home Owners Association, Inc., c/o  
17 Scott Groneman, Director, by regular and certified return receipt mail with copies of the  
18 Substitution and Forfeiture Order and the Notice. The regular mail was not returned. The  
19 certified mail was returned as unclaimed unable to forward. Notice of Filing Service of  
20 Process – Mailing, ECF No. 425-1, pg. 10, 15-21, 165-167.

21 On January 18, 2024, the Internal Revenue Service personally served Las Vegas  
22 International Country Club Estates Home Owners Association, Inc., c/o Scott Groneman,  
23 Director, with copies of the Substitution and Forfeiture Order and the Notice. Notice of  
24 Filing Service of Process – Personal Service, ECF No. 413-1, pg. 30, 33-39.

25 On January 11, 2024, the United States Attorney's Office served Las Vegas  
26 International Country Club Estates Home Owners Association, Inc., c/o Alan Stamm,  
27 President, by regular and certified return receipt mail with copies of the Substitution and

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1 Forfeiture Order and the Notice. Notice of Filing Service of Process – Mailing, ECF No.  
2 425-1, pg. 11, 15-21, 177-178.

3 On January 18, 2024, the Internal Revenue Service personally served Las Vegas  
4 International Country Club Estates Home Owners Association, Inc., c/o Alan Stamm,  
5 President, with copies of the Substitution and Forfeiture Order and the Notice. Notice of  
6 Filing Service of Process – Personal Service, ECF No. 413-1, pg. 31, 33-39.

7 On January 11, 2024, the United States Attorney's Office served and attempted to  
8 serve Bradley Burns and Lori Burns by regular and certified return receipt mail with copies  
9 of the Substitution and Forfeiture Order and the Notice. The regular mail was not returned.  
10 The certified mail was returned as unclaimed unable to forward. Notice of Filing Service of  
11 Process – Mailing, ECF No. 425-1, pg. 3, 15-21, 23-25.

12 On January 11, 2024, the United States Attorney's Office served Kelly Douglas Card  
13 (or Carn, Jr.) at S. Eastern Avenue by regular and certified return receipt mail with copies of  
14 the Substitution and Forfeiture Order and the Notice. Notice of Filing Service of Process –  
15 Mailing, ECF No. 425-1, pg. 3, 15-21, 26-27.

16 On January 11, 2024, the United States Attorney's Office served and attempted to  
17 serve Kelly Douglas Card (or Carn, Jr.) at Radcliff Street by regular and certified return  
18 receipt mail with copies of the Substitution and Forfeiture Order and the Notice. The  
19 regular mail was not returned. The certified mail was returned as unclaimed unable to  
20 forward. Notice of Filing Service of Process – Mailing, ECF No. 425-1, pg. 3, 15-21, 28-30.

21 On January 11, 2024, the United States Attorney's Office served Brent Lee Coralli by  
22 regular and certified return receipt mail with copies of the Substitution and Forfeiture Order  
23 and the Notice. Notice of Filing Service of Process – Mailing, ECF No. 425-1, pg. 3, 15-21,  
24 31-34.

25 On January 11, 2024, the United States Attorney's Office served the Estate of Larry  
26 Dean Coralli, c/o Brent Lee Coralli by regular and certified return receipt mail with copies  
27 of the Substitution and Forfeiture Order and the Notice. Notice of Filing Service of Process  
28 – Mailing, ECF No. 425-1, pg. 3, 15-21, 35-38.



1 On January 11, 2024, the United States Attorney's Office attempted to serve Larry  
2 Dean Coralli by regular and certified return receipt mail with copies of the Substitution and  
3 Forfeiture Order and the Notice. The regular mail and certified mail were both returned  
4 attempted – not known unable to forward. Notice of Filing Service of Process – Mailing,  
5 ECF No. 425-1, pg. 4, 15-21, 39-41.

6 On January 11, 2024, the United States Attorney's Office served Lucia Garanin or  
7 Costin or Aranin or Yaramin at zip code 98029 by regular and certified return receipt mail  
8 with copies of the Substitution and Forfeiture Order and the Notice. Notice of Filing Service  
9 of Process – Mailing, ECF No. 425-1, pg. 4, 15-21, 42-43.

10 On January 11, 2024, the United States Attorney's Office served and attempted to  
11 serve Lucia Garanin or Costin or Aranin or Yaramin at zip code 98321 by regular and  
12 certified return receipt mail with copies of the Substitution and Forfeiture Order and the  
13 Notice. The status of the certified mail is unknown as the post office has the document listed  
14 as in transit since February 18, 2024. Neither mailing was returned. Notice of Filing Service  
15 of Process – Mailing, ECF No. 425-1, pg. 4, 15-21, 44-48.

16 On January 11, 2024, the United States Attorney's Office served Jeffrey Haeberlin by  
17 regular and certified return receipt mail with copies of the Substitution and Forfeiture Order  
18 and the Notice. Notice of Filing Service of Process – Mailing, ECF No. 425-1, pg. 4, 15-21,  
19 49-50.

20 On January 11, 2024, the United States Attorney's Office served Nicole Hurbace /  
21 Nicole Gaudioso at Reynolds Avenue by regular and certified return receipt mail with  
22 copies of the Substitution and Forfeiture Order and the Notice. Notice of Filing Service of  
23 Process – Mailing, ECF No. 425-1, pg. 4, 15-21, 51-52.

24 On January 11, 2024, the United States Attorney's Office served Nicole Hurbace /  
25 Nicole Gaudioso at Moonlight View Court by regular and certified return receipt mail with  
26 copies of the Substitution and Forfeiture Order and the Notice. Notice of Filing Service of  
27 Process – Mailing, ECF No. 425-1, pg. 4, 15-21, 53-54.

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1 On January 11, 2024, the United States Attorney's Office attempted to serve Nicole  
2 Hurbace / Nicole Gaudioso at Ten Gallon Court by regular and certified return receipt mail  
3 with copies of the Substitution and Forfeiture Order and the Notice. The regular mail and  
4 certified mail were both returned attempted – not known unable to forward. Notice of Filing  
5 Service of Process – Mailing, ECF No. 425-1, pg. 4, 15-21, 55-57.

6 On January 11, 2024, the United States Attorney's Office attempted to serve Nicole  
7 Hurbace / Nicole Gaudioso at Chestnut Ridge Circle by regular and certified return receipt.  
8 mail with copies of the Substitution and Forfeiture Order and the Notice. The regular mail  
9 and certified mail were both returned attempted – not known unable to forward. Notice of  
10 Filing Service of Process – Mailing, ECF No. 425-1, pg. 4-5, 15-21, 58-60.

11 On January 11, 2024, the United States Attorney's Office served PITARO &  
12 FUMO, CHTD., Osvaldo E Fumo, Attorney for Phillip D. Hurbace, by regular and  
13 certified return receipt mail with copies of the Substitution and Forfeiture Order and the  
14 Notice. Notice of Filing Service of Process – Mailing, ECF No. 425-1, pg. 5, 15-21, 61-62.

15 On January 11, 2024, the United States Attorney's Office served and attempted to  
16 serve Phillip Hurbace at 1035 Mountain Quail Road by regular and certified return receipt  
17 mail with copies of the Substitution and Forfeiture Order and the Notice. The status of the  
18 certified mail is unknown as the post office has the document listed as available for pickup  
19 since February 7, 2024. Neither mailing was returned. Notice of Filing Service of Process –  
20 Mailing, ECF No. 425-1, pg. 5, 15-21, 63-66.

21 On January 11, 2024, the United States Attorney's Office served and attempted to  
22 serve Phillip Hurbace at 1055 Mountain Quail Road by regular and certified return receipt  
23 mail with copies of the Substitution and Forfeiture Order and the Notice. The status of the  
24 certified mail is unknown as the post office has the document listed as available for pickup  
25 since February 7, 2024. Neither mailing was returned. Notice of Filing Service of Process –  
26 Mailing, ECF No. 425-1, pg. 5, 15-21, 67-70.

27 On January 11, 2024, the United States Attorney's Office attempted to serve Phillip  
28 Hurbace at Oakhill Avenue by regular and certified return receipt mail with copies of the



1 Substitution and Forfeiture Order and the Notice. The regular mail and certified mail were  
2 both returned attempted – not known unable to forward. Notice of Filing Service of Process  
3 – Mailing, ECF No. 425-1, pg. 5, 15-21, 71-73.

4 On January 11, 2024, the United States Attorney's Office served Vicki Hurbace by  
5 regular and certified return receipt mail with copies of the Substitution and Forfeiture Order  
6 and the Notice. Notice of Filing Service of Process – Mailing, ECF No. 425-1, pg. 5, 15-21,  
7 74-75.

8 On January 11, 2024, the United States Attorney's Office served the Estate of Carl  
9 Kenneth Hurst c/o Teresa Hurst by regular and certified return receipt mail with copies of  
10 the Substitution and Forfeiture Order and the Notice. Notice of Filing Service of Process –  
11 Mailing, ECF No. 425-1, pg. 5, 15-21, 76-77.

12 On January 11, 2024, the United States Attorney's Office attempted to serve Carl  
13 Kenneth Hurst by regular and certified return receipt mail with copies of the Substitution  
14 and Forfeiture Order and the Notice. The regular mail and certified mail were both returned  
15 not deliverable as addressed unable to forward. Notice of Filing Service of Process –  
16 Mailing, ECF No. 425-1, pg. 5-6, 15-21, 78-81.

17 On January 11, 2024, the United States Attorney's Office served Teresa Hurst by  
18 regular and certified return receipt mail with copies of the Substitution and Forfeiture Order  
19 and the Notice. Notice of Filing Service of Process – Mailing, ECF No. 425-1, pg. 6, 15-21,  
20 82-83.

21 On January 11, 2024, the United States Attorney's Office served Larry Anthony  
22 McDaniel by regular and certified return receipt mail with copies of the Substitution and  
23 Forfeiture Order and the Notice. Notice of Filing Service of Process – Mailing, ECF No.  
24 425-1, pg. 6, 15-21, 84-85.

25 On January 11, 2024, the United States Attorney's Office attempted to serve HILL  
26 FIRM, Daniel Hill, Attorney for Larry Anthony McDaniel, by regular and certified return  
27 receipt mail with copies of the Substitution and Forfeiture Order and the Notice. The

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1 regular mail and certified mail were both returned illegible unable to forward. Notice of  
2 Filing Service of Process – Mailing, ECF No. 425-1, pg. 6, 15-21, 86-88.

3 On January 11, 2024, the United States Attorney's Office served and attempted to  
4 serve Gloria Rodney at PO Box 284 by regular and certified return receipt mail with copies  
5 of the Substitution and Forfeiture Order and the Notice. The regular mail was not returned.  
6 The certified mail was returned as unclaimed unable to forward. Notice of Filing Service of  
7 Process – Mailing, ECF No. 425-1, pg. 6, 15-21, 89-91.

8 On January 11, 2024, the United States Attorney's Office served and attempted to  
9 serve Gloria Rodney at Mountain Quail Road by regular and certified return receipt mail  
10 with copies of the Substitution and Forfeiture Order and the Notice. The status of the  
11 certified mail is unknown as the post office has the document listed as available for pickup  
12 since February 7, 2024. Neither mailing was returned. Notice of Filing Service of Process –  
13 Mailing, ECF No. 425-1, pg. 6, 15-21, 92-95.

14 On January 11, 2024, the United States Attorney's Office served Kerin Schroeder by  
15 regular and certified return receipt mail with copies of the Substitution and Forfeiture Order  
16 and the Notice. Notice of Filing Service of Process – Mailing, ECF No. 425-1, pg. 6, 15-21,  
17 96-97.

18 On January 11, 2024, the United States Attorney's Office served and attempted to  
19 serve Melinda Sebasovich at zip code 32082 by regular and certified return receipt mail with  
20 copies of the Substitution and Forfeiture Order and the Notice. The status of the certified  
21 mail is unknown as the post office has the document listed as in transit since January 21,  
22 2024. Neither mailing was returned. Lexis Public Records, Westlaw Public Records, and  
23 Accurant all list this location as her current location. Notice of Filing Service of Process –  
24 Mailing, ECF No. 425-1, pg. 6-7, 15-21, 98-101.

25 On January 11, 2024, the United States Attorney's Office attempted to serve Melinda  
26 Sebasovich at zip code 32063 by regular and certified return receipt mail with copies of the  
27 Substitution and Forfeiture Order and the Notice. The regular mail and certified mail were  
28 / / /

1 both returned not deliverable as addressed unable to forward. Notice of Filing Service of  
2 Process – Mailing, ECF No. 425-1, pg. 7, 15-21, 102-105.

3 On January 11, 2024, the United States Attorney's Office attempted to serve Melinda  
4 Sebasovich at zip code 89109 by regular and certified return receipt mail with copies of the  
5 Substitution and Forfeiture Order and the Notice. The regular mail and certified mail were  
6 both returned attempted – not known, unable to forward. Notice of Filing Service of Process  
7 – Mailing, ECF No. 425-1, pg. 7, 15-21, 106-108.

8 On January 11, 2024, the United States Attorney's Office attempted to serve Melinda  
9 Sebasovich at zip code 89074 by regular and certified return receipt mail with copies of the  
10 Substitution and Forfeiture Order and the Notice. The regular mail was returned as  
11 attempted – not known unable to forward. The certified mail was returned as insufficient  
12 address – unable to forward. Notice of Filing Service of Process – Mailing, ECF No. 425-1,  
13 pg. 7, 15-21, 109-111.

14 On January 11, 2024, the United States Attorney's Office served Perry Stasi at  
15 Anthem Village Drive by regular and certified return receipt mail with copies of the  
16 Substitution and Forfeiture Order and the Notice. Notice of Filing Service of Process –  
17 Mailing, ECF No. 425-1, pg. 7, 15-21, 112-113.

18 On January 11, 2024, the United States Attorney's Office served Perry Stasi at Villa  
19 Rica Drive by regular and certified return receipt mail with copies of the Substitution and  
20 Forfeiture Order and the Notice. Notice of Filing Service of Process – Mailing, ECF No.  
21 425-1, pg. 7, 15-21, 114-115.

22 On January 11, 2024, the United States Attorney's Office served and attempted to  
23 serve Perry Stasi at Canvas Edge Drive by regular and certified return receipt mail with  
24 copies of the Substitution and Forfeiture Order and the Notice. The regular mail was not  
25 returned. The certified mail was returned as not deliverable as addressed unable to forward.  
26 Notice of Filing Service of Process – Mailing, ECF No. 425-1, pg. 7, 15-21, 116-118.

27 On January 11, 2024, the United States Attorney's Office served Todd Vowell at zip  
28 code 84790 by regular and certified return receipt mail with copies of the Substitution and

1 Forfeiture Order and the Notice. Notice of Filing Service of Process – Mailing, ECF No.  
2 425-1, pg. 7, 15-21, 119-120.

3 On January 11, 2024, the United States Attorney's Office served and attempted to  
4 serve Todd Vowell at zip code 84770 by regular and certified return receipt mail with copies  
5 of the Substitution and Forfeiture Order and the Notice. The regular mail was returned as  
6 not deliverable as addressed. The certified mail return receipt was returned signed. Notice of  
7 Filing Service of Process – Mailing, ECF No. 425-1, pg. 8, 15-21, 121-123.

8 On January 11, 2024, the United States Attorney's Office served Robert Leroy Wolfe  
9 (or Kaufman) at zip code 89149 by regular and certified return receipt mail with copies of  
10 the Substitution and Forfeiture Order and the Notice. Notice of Filing Service of Process –  
11 Mailing, ECF No. 425-1, pg. 8, 15-21, 124-125.

12 On January 11, 2024, the United States Attorney's Office served Robert Leroy Wolfe  
13 (or Kaufman) at zip code 89131 by regular and certified return receipt mail with copies of  
14 the Substitution and Forfeiture Order and the Notice. Notice of Filing Service of Process –  
15 Mailing, ECF No. 425-1, pg. 8, 15-21, 126-127.

16 On January 11, 2024, the United States Attorney's Office attempted to serve Robert  
17 Leroy Wolfe (or Kaufman) at zip code 89044 by regular and certified return receipt mail  
18 with copies of the Substitution and Forfeiture Order and the Notice. The regular mail and  
19 certified mail were both returned no such number unable to forward. Notice of Filing  
20 Service of Process – Mailing, ECF No. 425-1, pg. 8, 15-21, 128-130.

21 On January 22, 2024, the United States Attorney's Office served Deborah Mayers by  
22 regular and certified return receipt mail with copies of the Substitution and Forfeiture Order  
23 and the Notice. Notice of Filing Service of Process – Mailing, ECF No. 425-1, pg. 12, 15-21,  
24 199-201.

25 This Court finds no petition as to Sylviane Della Whitmore, a/k/a: "Sylviane  
26 Cordova," was filed herein by or on behalf of any person or entity and the time for filing  
27 such petitions and claims has expired.

28 / / /

1 This Court finds no petitions as to Sylviane Della Whitmore, a/k/a: “Sylviane  
2 Cordova,” are pending regarding the property named herein and the time has expired for  
3 presenting such petitions.

4 THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that  
5 all possessory rights, ownership rights, and all rights, titles, and interests in the property  
6 hereinafter described are condemned, forfeited, and vested in the United States:

7 1. \$32,938.34 of 10270 Hammerschmidt Court, Las Vegas, Nevada 89135, more  
8 particularly described as:

9 LOT EIGHTY-THREE (83) IN BLOCK TWO (2) OF SIERRA WOODS  
10 AT SUMMERLIN – UNIT 1, AS SHOWN BY MAP THEREOF ON FILE  
11 IN BOOK 83 OF PLATS, PAGE 92 IN THE OFFICE OF THE COUNTY  
12 RECORDER OF CLARK COUNTY, NEVADA, TOGETHER WITH  
ALL IMPROVEMENTS AND APPURTENANCES THEREON; APN:  
164-12-711-051

13 (forfeited property); if the Hammerschmidt Property is sold, the net equity-after fees, costs,  
14 and expenses-will be applied first to the criminal forfeiture money judgment amount of  
15 Count 30 and then toward the payment of the rest of the criminal forfeiture money  
16 judgment amounts; and

17 that the United States recover from Sylviane Della Whitmore, a/k/a: “Sylviane  
18 Cordova,” the in personam criminal forfeiture money judgment of \$459,000, and that the  
19 forfeited property will be applied toward the payment of the money judgment under Ninth  
20 Circuit case law, forfeiture statutes, and Fed. R. Crim. P. 32.2(b)(2)(A); and

21 that all possessory rights, ownership rights, and all rights, titles, and interests in the  
22 substitute property hereinafter described are condemned, forfeited, and vested in the United  
23 States:

24 The substituted real property located at 3189 Pinehurst Drive, Unit C, Las Vegas,  
25 Nevada 89109, more particularly described as:

26 PARCEL I: UNIT “C,” BUILDING ELEVEN (11) OF LAS VEGAS  
27 INTERNATIONAL COUNTRY CLUB ESTATES - TOWNHOME  
28 CONDOMINIUMS - PHASE 1, AS SHOWN BY MAP THEREOF ON  
FILE IN BOOK 14 OF PLATS, PAGE 10, IN THE OFFICE OF THE  
COUNTY RECORDER OF CLARK COUNTY, NEVADA.

1 PARCEL II: AN UNDIVIDED 1/47TH INTEREST IN AND TO THE  
 2 COMMON AREAS TOGETHER WITH AN EXCLUSIVE EASEMENT  
 3 TO USE PARKING SPACE NO. 11-C OF LAS VEGAS  
 4 INTERNATIONAL COUNTRY CLUB ESTATES - TOWNHOUSE  
 5 CONDOMINIUMS PHASE ONE, AS THE SAME IS ESTABLISHED IN  
 6 THE PLAN RECORDED IN THE OFFICE OF THE COUNTY  
 7 RECORDER OF CLARK COUNTY, NEVADA, IN BOOK 14, PAGE 10,  
 8 AND AS AMENDED IN BOOK 205, PAGE 164, AND THE  
 9 DECLARATION OF COVENANTS, CONDITIONS AND  
 10 RESTRICTIONS RECORDED IN THE OFFICE OF THE COUNTY  
 11 RECORDER OF CLARK COUNTY, NEVADA, OFFICIAL RECORDS,  
 12 BOOK 206, AS DOCUMENT NO. 165836;

13 PARCEL III: THE FOLLOWING APPURTENANT EASEMENT: AN  
 14 EXCLUSIVE EASEMENT FOR INGRESS AND EGRESS OVER  
 15 CERTAIN STREETS CREATED IN THE DECLARATION OF  
 16 EASEMENTS, RIGHTS, CONDITIONS AND RESTRICTIONS  
 17 RECORDED IN BOOK 941 AS INSTRUMENT NO. 755353 AND IN  
 18 THE DECLARATION OF EASEMENTS, RIGHTS, CONDITIONS AND  
 19 RESTRICTIONS RECORDED IN BOOK 941 AS INSTRUMENT NO.  
 20 755358, TOGETHER WITH ALL IMPROVEMENTS AND  
 21 APPURTENANCES THEREON; APN: 162-10-717-042

22 (substitute property) and that the net sale proceeds of the substitute property will be applied  
 23 toward the payment of the money judgments under Ninth Circuit case law, forfeiture  
 24 statutes, and Fed. R. Crim. P. 32.2(b)(2)(A); and

25 the forfeiture of (1) the money judgments, (2) the forfeited property, and (3) the  
 26 substitute property are imposed under Fed. R. Crim. P. 32.2(b)(4)(A) and (b)(4)(B); Fed. R.  
 27 Crim. P. 32.2(c)(2); Fed. R. Crim. P. 32.2(e)(1)(B); 18 U.S.C. § 981(a)(1)(A) and (a)(1)(C)  
 28 with 28 U.S.C. § 2461(c); 18 U.S.C. § 982(a)(1); 21 U.S.C. § 853(p); and 21 U.S.C. §  
 853(n)(7); the money judgments shall be collected; the forfeited property shall be collected,  
 the proceeds of the substitute property shall be collected; and all collected amounts shall be  
 disposed of according to law.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that under Fed. R.  
 Crim. P. 32.2(c) and 21 U.S.C. § 853(n)(7), all possessory rights, ownership rights, and all  
 rights, titles, and interests in the forfeited property and the substitute property are  
 extinguished and are not recognized as to all potential third parties, and the following  
 individuals and entities:

/ / /



- 1        1. Sylviane Della Whitmore, a/k/a: "Sylviane Cordova," Larry Anthony  
2        McDaniel, Phillip D. Hurbace;
- 3        2. Clark County, Nevada, including the following offices: Clark County District  
4        Attorney, Clark County Treasurer, Clark County Assessor, Clark County  
5        Recorder, Clark County Clerk, Las Vegas Valley Water District, Southern  
6        Nevada Water Authority, Clark County Water Reclamation, Clark County  
7        Commission, Clark County Board of Commissioners;
- 8        3. City of Las Vegas, including the following offices: City Attorney, City Clerk, City  
9        of Las Vegas Sewer, Public Works of City of Las Vegas;
- 10       4. Las Vegas International Country Club Estates Home Owners Association, Inc.;  
11       Quadro Homeowners' Association; Sierra Community Management LLC; and  
12       Summerlin South Community Association; and
- 13       5. Bradley Burns and Lori Burns, Kelly Douglas Card (Or Carn, Jr.), Larry Dean  
14       Coralli, Estate of Larry Dean Coralli, Brent Lee Coralli, Lucia Garanin or Costin  
15       or Aranin or Yaramin, Jeffrey Haeberlin, Nicole Hurbace / Nicole Gaudioso;  
16       Vicki Hurbace, Carl Kenneth Hurst, The Estate of Carl Kenneth Hurst, Teresa  
17       Hurst, Deborah Mayers, Melinda Sebasovich, Kerin Schroeder, Perry Stasi,  
18       Todd Vowell, Robert Leroy Wolfe (or Kaufman).

19       IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the United  
20       States may sell 3189 Pinehurst Drive, Unit C, notwithstanding any third party's name on  
21       the deed/title and the title company shall provide clear title on behalf of the United States  
22       for the sale of the forfeited property under 21 U.S.C. § 853(n)(7).

23       IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that any and all  
24       forfeited funds, including but not limited to, currency, currency equivalents, certificates of  
25       deposit, as well as any income derived as a result of the government's management of any  
26       property forfeited herein, and the proceeds from the sale of any forfeited property shall be  
27       disposed of according to law.

28       / / /



1 IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Clerk send  
2 copies of this Order to all counsel of record and three certified copies to the United States  
3 Attorney's Office, Attention Asset Forfeiture Unit.

4 DATED March 28, 2024.

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8 ANDREW P. GORDON  
9 UNITED STATES DISTRICT JUDGE  
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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No.: 2:17-cr-00110-APG-DJA

Plaintiff

**Order Regarding Restitution**

v.

SYLVIANE WHITMORE, et al.,

Defendants

Defendants Phillip Hurbace and Sylviane Whitmore were convicted of charges arising from the 2012 robbery of a private security box business known as 24/7 Private Vaults. The Government seeks an order of restitution for the victims of that robbery.<sup>1</sup> Seven victims reported to law enforcement that they had suffered identifiable losses. The defendants do not contest that the seven claimants were actual victims, but they contest the amounts being sought. I conducted hearings on March 26 and May 1, 2024 and allowed the parties to file supplemental briefs. Below are my findings regarding restitution.

The Mandatory Victim Restitution Act (MVRA), 18 U.S.C. § 3663A, requires me to award restitution to the robbery victims. The Government has the burden of proving the amount of loss by a preponderance of the evidence. 18 U.S.C. § 3664(e); *United States v. Hymas*, 780 F.3d 1285, 1293 n.4 (9th Cir. 2015) (same).

**Bradley Burns**

The parties agree that Mr. Burns is entitled to restitution in the amount of \$284,035. ECF Nos. 509 at 2, 519 at 6.

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<sup>1</sup> Co-defendant Larry McDaniel was convicted of a different robbery at 24/7 Private Vaults but not the 2012 robbery. The Government does not seek restitution from him.

1           **Jeffrey Haeberlin**

2           Mr. Haeberlin claims the loss of a coin collection he had amassed over decades. He  
3 requests \$83,665.58 in restitution, which he contends is the 2024 value of the stolen coins. ECF  
4 No. 461-3 at 9-15. The defendants argue he is entitled to only \$52,015, the amount he claimed  
5 on a 2013 IRS Casualties and Thefts form. *Id.* at 16. The MVRA requires restitution for the  
6 greater of the value of the property on the date of loss or the value on the date of sentencing. 18  
7 U.S.C. § 3663A(b)(1)(B). Thus, Haeberlin is entitled to \$83,665.58 in restitution.

8           **Robert Wolfe**

9           Mr. Wolfe requests \$456,200 in restitution. ECF Nos 461, 461-6. He filed a police report  
10 on July 19, 2012 claiming he lost “between \$250,000 - \$300,000 . . . some random coins,  
11 documents and papers.” ECF No. 461 at 4. At the restitution hearing, Mr. Wolfe testified that  
12 the stolen funds came from a variety of sources: a settled insurance claim from 25-30 years ago,  
13 a 20-year-old jackpot he won, gambling winnings from 12-20 years before, another settled  
14 insurance claim from approximately 20 years ago, and proceeds from selling his insurance  
15 business approximately 16 years ago. He admits that he did not put all of these proceeds into his  
16 vault over the years.

17           In 2015, Mr. Wolfe pleaded guilty to conspiracy to sell oxycodone and was sentenced to  
18 prison. He had been engaged in this conspiracy before and after the 2012 robbery at 24/7 Private  
19 Vaults. ECF No. 509-4 at 20-22, 509-5. He testified at the restitution hearing in this case that he  
20 put money and property into his vault to hide it from the federal government when it prosecuted  
21 him. He admits he co-mingled his legitimate funds with the proceeds of his criminal activities.

22           “Where the property taken from the victim plainly was derived . . . from conduct  
23 determined by a court to be unlawful, although the MVRA does not explicitly limit the definition

1 of a victim on that basis, it may be appropriate to deny restitution.” *United States v. Taylor*, No.  
2 CR CCB-17-106, 2021 WL 2930278, at \*5 (D. Md. July 12, 2021), *aff’d*, 62 F.4th 146 (4th Cir.  
3 2023) (citing *United States v. Martinez*, 978 F. Supp. 1442 (D.N.M. 1997)). Mr. Wolfe’s claim  
4 is dubious at best. The amount he seeks is nearly double the amount he claimed in the police  
5 report he filed a few months after the robbery, but less than one-quarter of the amount he claimed  
6 when talking to undercover officers in 2013. ECF Nos. 461-6 at 4, 509-4 at 20-22. The  
7 legitimately sourced funds he allegedly put in the vault were from many years prior, while the  
8 illegally gotten funds were obtained closer in time to the robbery. Because of this timing, it is  
9 more likely that the stolen funds were illegal proceeds, rather than legitimate funds allegedly  
10 earned over the prior three decades.

11 It is intuitively obvious that Congress did not intend to have the federal judiciary  
12 take the lead in rewarding, through restitution orders, persons robbed of monies  
13 they had obtained by unlawful means, especially where as a matter of policy,  
14 federal courts generally would not award those monies were they sought in a civil  
action. This is especially true when the person who would benefit has violated  
federal laws.

15 *Martinez*, 978 F. Supp. at 1453. Wolfe is not entitled to restitution for the stolen cash because it  
16 was likely obtained from his felonious activity. However, I will order restitution in the amount  
17 of \$156,200 for lost jewelry and coins that are not alleged to have been criminal proceeds. ECF  
18 No. 461-6 at 2-3.

19 **Todd Vowell**

20 Mr. Vowell seeks \$867,400 in restitution for cash, coins, and precious metals. ECF No.  
21 461-7. The defendants’ objection focuses on Mr. Vowell’s activities with Jeremy Johnson, who  
22 was investigated and sued by the Federal Trade Commission (FTC). That investigation resulted  
23 in an injunction and judgment against Jeremy Johnson and a criminal conviction in a separate

1 case. ECF No. 509-8. *See also Federal Trade Commission v. 249 Invs., LLC*, Case No. 2:10-cv-  
2 2203-MMD-GWF; ECF No. 1941 (8/26/16). Ms. Whitmore claims that Mr. Vowell obtained the  
3 stolen funds through Mr. Johnson, and the funds should have been disgorged to the FTC. ECF  
4 No. 509 at 10. The FTC, through its receiver, sued Mr. Vowell, and that lawsuit was eventually  
5 settled and dismissed. ECF Nos. 509-11, 509-12. The 24/7 Private Vault robbery occurred  
6 before Mr. Vowell was sued and nearly two years before the settlement.

7       The defendants ask me to follow *Martinez* and deny Mr. Vowell restitution because his  
8 funds were obtained illegally. In *Martinez*, the defendant robbed a casino that had been  
9 operating unlawfully. The court declined to order restitution. “An order of restitution, in  
10 addition to the other penalties imposed, would involve the court directly and intimately in  
11 returning ill-gotten funds. A court’s participation in such an endeavor would, at the least, be  
12 unseemly. The federal courts should not be collection agents for scofflaws.” 978 F.Supp. at  
13 1454. But this case is more akin to *United States v. Taylor*, where a police officer was convicted  
14 of robbing alleged drug dealers and was ordered to pay restitution under the MVRA. 2021 WL  
15 2930278, at \*5. Contrary to the casino/victim in *Martinez*, it was not proven that Taylor’s  
16 victims had engaged in illegal activity.

17       Where the property taken from the victim plainly was derived, as it was in  
18 *Martinez*, from conduct determined by a court to be unlawful, . . . it may be  
19 appropriate to deny restitution. Where the record is less clear as to the source of  
20 the victim’s property, however, the court must balance the policy consideration  
21 Taylor has raised with the clear statutory mandate to award restitution in the full  
22 amount of the victim’s loss in order to both compensate the victim and to ensure  
23 that the offender realizes the damage caused by the offense and pays the debt  
owed to the victim as well as to society. . . . This dual restorative and penal  
purpose is not served by engaging in an exhaustive fact-finding mission into the  
victim’s background, history, and source of income. . . . To do so would negate  
Congress’s intent that restitution under the MVRA is mandatory and would create  
the impression that the consequences of a criminal act against a person who  
allegedly has engaged in unlawful conduct should be less serious simply because  
of the victim’s status.

1 *Taylor*, 2021 WL 2930278, at \*5 (simplified).

2 Mr. Vowell was not convicted of any crime related to the property that was stolen from  
3 his vault, and there is no indication he hid those assets from the receiver. Thus, he is situated  
4 differently from Mr. Wolfe. Indeed, Vowell's items were stolen two years before his FTC  
5 settlement, so they could not have been part of that settlement. The documents submitted by Mr.  
6 Vowell support his claim. ECF No. 461-7. He is entitled to restitution in the amount of  
7 \$867,400.

8 **Kelly Carn**

9 Mr. Carn seeks \$47,700 for stolen cash, coins, vehicle titles, and collectible coins and  
10 bills. ECF No. 461-4. Although he admits he put items in his vault to hide them from the  
11 Government while he was being prosecuted for weapons charges, he has not been convicted of  
12 any crime related to the property that was stolen from his vault. ECF No. 509-20, 509-21. He  
13 has adequately supported his request with testimony and documentation. He is entitled to  
14 restitution in the amount of \$47,700.

15 **Carl Hurst**

16 On May 9, 2012, Mr. Hurst reported to the police that he lost a coin collection and  
17 \$10,000 in cash. ECF No. 461-2 at 3. Mr. Hurst is now deceased but a claim for restitution was  
18 presented by his sister. ECF No. 461-2. A family member may assume a deceased victim's  
19 rights under the MVRA. 18 U.S.C. § 3663A(a)(2). It is unclear how much the coins were worth,  
20 but Mr. Hurst's sister has adequately supported the claim so Mr. Hurst's estate is entitled to  
21 \$10,000 in restitution.

22 ////

23 ////





DEFENDANT: Sylviane Della Whitmore  
CASE NUMBER: 2:17-cr-00110-APG-DJA-3  
DISTRICT: Nevada

**REASON FOR AMENDMENT**  
**(Not for Public Disclosure)**

**REASON FOR AMENDMENT:**

- |   |  |
|---|--|
| <input type="checkbox"/> Correction of Sentence on Remand (18 U.S.C. 3742(f)(1) and (2))          | <input type="checkbox"/> Modification of Supervision Conditions (18 U.S.C. § 3563(c) or 3583(e))   |
| <input type="checkbox"/> Reduction of Sentence for Changed Circumstances (Fed. R. Crim. P. 35(b)) | <input type="checkbox"/> Modification of Imposed Term of Imprisonment for Extraordinary and Compelling Reasons (18 U.S.C. § 3582(c)(1))                              |
| <input type="checkbox"/> Correction of Sentence by Sentencing Court (Fed. R.Crim. P. 35(a))       | <input type="checkbox"/> Modification of Imposed Term of Imprisonment for Retroactive Amendment(s) to the Sentencing Guidelines (18 U.S.C. § 3582(c)(2))             |
| <input type="checkbox"/> Correction of Sentence for Clerical Mistake (Fed. R.Crim. P. 36)         | <input type="checkbox"/> Direct Motion to District Court Pursuant to<br><input type="checkbox"/> 28 U.S.C. § 2255 or <input type="checkbox"/> 18 U.S.C. § 3559(c)(7) |
|   | <input checked="" type="checkbox"/> Modification of Restitution Order (18 U.S.C. § 3664)   |